



Asphalt Shingle Recycling 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. The Lane Regional Air Protection Agency (LRAPA) has very strict requirements for the handling, removal and disposal of asbestos-containing materials.

Any material that contains greater than one percent asbestos by weight is an asbestos-containing material and regulated by LRAPA.

LRAPA prohibits the recycling of any asbestos-containing roofing waste into recycled asphalt product to surface any roadway, including highways, roads, streets, parking areas and driveways. In addition, asbestos-containing roofing waste cannot be ground up for recycling into other products. Recycling may cause the material to release asbestos fibers and pose human health and environmental risks.

Generally asbestos-containing asphalt roofing materials are considered non-friable material. Non-friable asbestos-containing roofing waste must be handled and disposed of in a way that keeps the waste material intact. Non-friable materials have a binder that holds the asbestos fibers within a solid form, in this case asphalt, so asbestos fibers will not easily release unless mishandled, damaged, or in badly worn or weathered condition. Non-friable asbestos-containing roofing waste materials must be disposed of at a landfill permitted to receive non-friable asbestos waste.

Recycled Asphalt Roofing Products

Facilities wanting to recycle three-tab composition roofing shingles and associated felt/tar paper must follow these requirements:

- Collect at least one bulk sample of each layer of felt/tar paper (the underlayment beneath the three-tab shingles) and have the samples analyzed at a laboratory that performs asbestos analysis OR separate out the felt paper for proper disposal.
- LRAPA has determined that most three-tab composition shingles do not contain asbestos so sampling of the three-tab composition shingles is optional.

- The waste materials should be sampled prior to removal and at the location of the roof removal site whenever possible.
- Remove and separate out any questionable materials such as roof patch and sealants whenever possible at the location of the roof removal site and properly dispose of these materials at a landfill permitted to receive asbestos-containing waste materials. If the contractor wants to dispose of these materials as non-asbestos waste, then sampling must be done first to verify no asbestos is present.
- Segregate sampled loads until sample results identify that the loads are asbestos free.
- Properly dispose of any non-friable waste materials that contain asbestos at a landfill permitted to accept non-friable asbestos-containing waste materials.
- Maintain copies of all sample results and associated Chain of Custody for all sampled loads.
- Make readily available for inspection by LRAPA staff all sample results and associated Chain of Custody.
- The following non-friable materials may only be collected for disposal, must remain intact and may not be ground up or recycled: built-up roofing, rolled roofing, coatings, roof patch, sealants and other types of non-friable roofing materials.

If you disturb or mishandle ACM or ACWM and cause the public or the environment to be potentially exposed to asbestos fibers, you may be subject to enforcement action with civil penalties in violation of rule or statute.

Find LRAPA's asbestos rules in [Title 43](#). If you have questions or need technical assistance, contact an asbestos program staff. Additional information is available on [LRAPA's asbestos information page](#).

Alternative Formats

Alternative formats of this document can be made available. For more information, call 541-736-1056 or email asbestos@lrapa.org.

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