



Asbestos Information for Roofing Contractors

Lane Regional Air Protection Agency (LRAPA) has specific rules regarding the handling, removal and disposal of asbestos-containing materials, commonly referred to as ACM. LRAPA regulates ACM abatement to prevent asbestos fiber release and exposure.

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.

If you perform roof replacement, repair or maintenance activities you need to be aware of rules that may affect your ability to perform these activities.

Before any public or private facility has any renovation, demolition, repair, construction or maintenance activities all ACM must be properly abated. Abatement includes handling, removing, disposing, repairing, salvaging, enclosing or encapsulating any ACM.

LRAPA's asbestos survey rule requires a thorough inspection by an accredited inspector to determine the presence of ACM in or on all public or private structures prior to any renovation or demolition activities. A copy of the asbestos survey is required to be onsite during all renovation or demolition activities and LRAPA can request a copy of the asbestos survey. Asbestos consultants and many of the asbestos abatement contractors can provide this service. Factsheets are available regarding the asbestos survey requirements.

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

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

asbestos abatement contractor must abate the materials.

In general, there are two types of ACMs:

- **Friable** ACM will easily release asbestos fibers when crushed. Only DEQ licensed asbestos abatement contractors and certified asbestos workers can handle, remove and dispose of friable ACM. LRAPA has information about specific training courses available that meet these certification needs. A list of DEQ licensed asbestos abatement contractors and training provider information is available on [LRAPA's asbestos information page](#) or [DEQ's asbestos information page](#).

Examples of **friable** ACM include, but are not limited to: roof paper, also known as Niccolite and commonly found under wood shingles, and silver roof paint. Roofing materials that have been impacted by fire are considered friable ACMs.

- **Non-friable** ACM has a binder that holds the asbestos fibers within a solid matrix so asbestos fibers will not easily release unless mishandled, damaged, or in badly worn or weathered condition. You do not need to be a DEQ licensed asbestos abatement contractor or a certified asbestos worker to perform non-friable asbestos abatement. **However, the non-friable materials must remain in non-friable condition and predominantly whole pieces during the removal and disposal process.**

Examples of **non-friable** ACM include, but are not limited to: cement roofing or paneling, also known as CAB or transite, mastics, caulking, built-up roofing materials, underlayment felt paper and patch compounds.

If you remove non-friable ACM, a [10-day notification](#) and fee are required to be submitted to the LRAPA office five days prior to the start date of the project.

Asbestos Program

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Non-friable asbestos-containing waste material, referred to as non-friable ACWM, must be kept adequately wet during abatement. LRAPA recommends packaging the non-friable ACWM in leak-tight containers. The ACWM must be disposed of at a landfill permitted to accept asbestos waste and should be accompanied by an [ASN-4 waste shipment report form](#) at the time of disposal.

Contact the landfill prior to delivering the non-friable ACWM. Landfills can be stringent and may only accept ACWM by appointment.

Roofing mastics that are fully encapsulated with a petroleum based binder and are not hard, dry or brittle are exempt from certain rules. The exemption will end whenever the materials are burned, crumbled, pulverized, or reduced to dust. Contact an asbestos program staff for more information.

Maintenance and comparable activities limited to less than three square feet or three linear feet of ACM, provided the removal is part of a needed repair operation, may be exempt from certain rules. Contact an asbestos program staff for more information.

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.

Copies of non-friable factsheets, notification forms, lists and other information is available on [LRAPA's asbestos information page](#).

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

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