



METRO

Metro Solid Waste Regulatory Guidance Bulletin

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Acceptance and Management of Asphalt Roofing Waste Generated in the Metro Region

Metro's solid waste regulatory system supports the region's sustainability and waste reduction goals by ensuring that waste generated in the Metro region is delivered to appropriate, safe, and well-operated reloading and processing facilities. Metro routinely coordinates and consults with local governments and the Oregon Department of Environmental Quality (DEQ) about facilities, whether they are located inside or outside the region.

Introduction

The purpose of this guidance bulletin is to summarize Metro's regulatory requirements with respect to the acceptance, management, and use of asphalt roofing waste (including mixed roofing tear-off debris, manufacturer's scrap, post-consumer source-separated asphalt shingles, and built-up roofing). This bulletin also addresses general issues associated with roofing waste and provides direction as to the proper management of this waste stream.

Definitions

The following definitions will be useful in understanding the concepts described in this bulletin.

Asbestos-containing material means any material containing more than one percent asbestos by weight (as defined in OAR 340-248-0010).

Built-up roofing consists of multiple plies of roof felts laminated together with bitumen. Built-up roof material can consist of bitumen-saturated felt, coated felt, polyester felt or other fabrics. A surfacing is generally applied and can be asphalt, aggregate, emulsion or a granule-surfaced cap sheet.

Contaminant or Contamination means items or pieces of material of a different physical or chemical composition from the bulk of the load. For example, in a load of asphalt roofing shingles, a section of rain gutter, fascia boards, or a bag containing the remnants of someone's lunch would be considered contaminants.

Inert means containing only constituents that are biologically and chemically inactive and that, when exposed to biodegradation and/or leaching, will not adversely impact the waters of the state or public health (as defined in Metro Code Section 5.01.010).

Homogeneous means the same in structure, quality; similar or identical, composed of similar or identical elements or parts; uniform. A homogenous waste load is one comprised of a single type of material. Contamination may consist of no more than a few discrete items that can be easily removed without subjecting the load to manual or mechanical recovery including either positive or negative sorting. Homogeneity is based on composition rather than use. Loads containing only asphalt shingles or only wood shingles would be homogeneous loads. However, a load containing both asphalt shingles and wood shingles would not be considered homogeneous.

Non-system facility means any solid waste disposal site, transfer station, processing facility, recycling drop center, resource recovery facility or other facility for the disposal, recycling or other processing of solid waste which does not constitute part of the region's solid waste system (as defined in Metro Code Section 5.05.010).

Solid Waste means all Putrescible Waste and Non-Putrescible Wastes...including without limitation...source-separated recyclable material... (as defined in Metro Code Section 5.01.010).

Source separate means that the person who last uses recyclable material separates the recyclable material from solid waste (as defined in Metro Code Section 5.01.010).

Source-separated recyclable material or Source-separated recyclables means solid waste that has been Source Separated by the waste generator for the purpose of Reuse, Recycling, or Composting. This term includes all homogenous loads of Recyclable Materials that have been Source-Separated by material type for the purpose of recycling (i.e., source-sorted) (as defined in Metro Code Section 5.01.010).

Facility Requirements

A. Exempt Facilities

Facilities that exclusively receive source-separated, homogeneous loads of asphalt shingles for reuse or recycling, or for the purpose of reloading to another facility for reuse or recycling, are not required to obtain a Metro solid waste facility license or franchise. Source-separated loads may be comprised of post-consumer asphalt shingles or pre-consumer manufacturer's scrap and off-specification material. Both pre-and post-consumer material must have been previously sorted at a Metro-authorized material recovery facility or by the generator to remove associated contaminants such as shingle wrap, pallets, plywood, fascia boards, flashing and vents. Facilities seeking to grind asphalt roofing shingles must first obtain authorization from DEQ.

B. Licensed/Franchised Facilities

Metro's Enhanced Dry Waste Recovery Program (EDWRP - see Metro Solid Waste Regulatory Guidance Bulletin No. 8) requires that all mixed non-putrescible waste generated in the Metro

region be delivered to a Metro-authorized material recovery facility. Facilities that receive loads of mixed roofing waste (i.e., loads comprised of commingled roofing materials such as asphalt roofing shingles, shingle wrap, plywood, fascia boards, flashing, vents or other non-putrescible waste) must have a Metro solid waste facility license or franchise and comply with all applicable material management requirements. In particular, Metro requires that all mixed non-putrescible waste (including mixed roofing debris) be managed on an impervious surface within a roofed building that is enclosed on at least three sides.

Asphalt roofing shingles that have been source-separated or previously sorted from contaminants may be stored outside of a building unless otherwise prohibited by local or state jurisdictions. In general, the maximum amount of time that facilities may store recovered or source-separated materials on site is 180 days (six months); however, Metro may impose lesser time limits if warranted. Additionally, Metro may impose tonnage and pile height limits for such materials. Operators should refer to their individual Metro-issued authorization for site-specific storage requirements.

Facilities that have obtained Metro and DEQ authorization to grind asphalt roofing shingles must follow a DEQ-approved testing protocol to certify that the material is free of asbestos and ensure that it is not commingled with other materials prior to grinding unless otherwise allowed by the DEQ.

C. Non-System Facilities

Facilities, haulers, and generators seeking to deliver loads of mixed roofing debris to a non-system material recovery facility must first obtain a Non-System License from Metro. A prospective licensee will need to provide documentation to Metro demonstrating that the proposed non-system facility is in substantial compliance with the facility performance standards, design and operating requirements, and material recovery requirements provided in Metro Code (see Solid Waste Administrative Procedure No. 501, Section 7 and Metro Code Section 5.01.125). Metro Solid Waste Administrative Procedures can be accessed at www.oregonmetro.gov.

D. Prohibited Activities

Certain forms or methods of processing asphalt roofing shingles are prohibited by Metro, for example:

- Asphalt roofing shingles are not an inert material and may not be processed with inert materials such as concrete or rubble for producing recycled aggregate.
- Asphalt roofing shingles may not be commingled with yard debris or other green feedstocks for composting or other landscaping uses. The use of asphalt roofing shingles for the production of landscaping materials has been problematic in Oregon because of many health risks posed to humans and aquatic life. Additional information on the issues that previously resulted from products containing such materials, such as “No Spark Bark” or “Budget Bark,” is available from the DEQ through its Fact Sheet

entitled “Consumer Alert: Bark Mulches Made from Roofing Wastes May Be Unsafe to Use” at: <http://www.deq.state.or.us/lq/pubs/factsheets/ConsumerAlertBark.pdf> .

Built-Up Roofing

Built-up asphalt roofing is highly likely to contain asbestos and is presumed to be asbestos-containing material (ACM) unless otherwise demonstrated. Therefore, the material is subject to additional regulatory requirements by the DEQ. In particular, the DEQ requires that all permitted solid waste facilities establish procedures for managing such material and obtain proof from the generator that the built-up roofing does not contain asbestos prior to acceptance at the site.

These requirements apply to all facilities that accept built-up roofing including those that accept roofing as feedstock for the production of asphalt pavement. For additional information see the DEQ Fact Sheet entitled “Asphalt Shingle Reuse and the Asbestos Rules” at <http://www.deq.state.or.us/aq/factsheets/10nwr005asbestos.pdf>. Questions about ACM, including built-up roofing, may be directed to Kevin McCrann (DEQ) at (503) 667-8414 extension 55018.

EDWRP requires that all mixed non-putrescible waste, including mixed roofing waste, be delivered to an authorized material recovery facility prior to disposal. This means that generators cannot deliver their mixed roofing debris directly to a landfill. However, this requirement does not apply to built-up roofing debris because of its potential to be asbestos-containing material.

If you have questions or need additional information regarding this guidance bulletin, please contact Will Ennis, Metro Solid Waste Compliance & Cleanup Division, at 503-797-1667 or will.ennis@oregonmetro.gov.

This regulatory guidance bulletin is advisory only, and is intended to provide assistance in understanding certain Metro solid waste requirements. The information contained in the bulletin is not an administrative procedure, rule or performance standard as set forth in Metro Code Section 5.01.132.

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