

Asbestos Roofing Frequently Asked Questions

Asbestos-containing material (ACM) is material containing more than one percent asbestos as determined using the methods specified in appendix E, subpart E, 40 CFR part 763, section 1, Polarized Light Microscopy. The Asbestos NESHAP classifies ACM as either "friable" or "nonfriable". Friable ACM is ACM that, when dry, can be crumbled, pulverized or reduced to powder by hand pressure. Nonfriable ACM is ACM that, when dry, cannot be crumbled, pulverized or reduced to powder by hand pressure.

Nonfriable ACM is further classified as either Category I ACM or Category II ACM. Category I ACM and Category II ACM are distinguished from each other by their potential to release fibers when damaged. **The applicability of the Asbestos NESHAP to Category I and II ACM depends on: (1) the condition of the material at the time of demolition or renovation, (2) the nature of the operation to which the material will be subjected, (3) the amount of ACM involved.**

If the coverage threshold for RACM is met or exceeded in a renovation or demolition operation, then all friable ACM in the operation, and in certain situations, nonfriable ACM in the operation, are subject to the NESHAP.

What is the purpose of the Asbestos NESHAP regulation?

The purpose of the asbestos NESHAP regulation is to protect the public health by minimizing the release of asbestos when facilities that contain asbestos-containing materials (ACMs) are demolished or renovated.

What is a "facility?"

As defined in the regulation, a "facility" is any institutional, commercial, public, industrial or residential structure, installation or building (including any structure, installation or building containing condominiums, or individual dwelling units operated as a residential cooperative, but excluding residential buildings having four or fewer dwelling units); any ship; or any active or inactive waste disposal site. Any building, structure or installation that contains a loft used as a dwelling is not considered residential. Any structure, installation, or building that was previously subject to the Asbestos NESHAP is not excluded, regardless of its current use or function.

Are facilities constructed in the past 10 years subject to the asbestos regulations?

Yes. There is no exclusion date in the asbestos regulations for facilities constructed in the past 10 years.

What are Category I asbestos-containing materials?

Category I ACM includes asbestos-containing gaskets, packings, resilient floor coverings, resilient floor covering mastic, and asphalt roofing products containing more than one percent asbestos. Asphalt roofing products, which may contain asbestos, include built-up roofing; asphalt-containing single ply membrane systems; asphalt shingles; asphalt-containing underlayment felts; asphalt-containing roof coatings and mastics; and asphalt-containing base flashings. ACM roofing products that use other bituminous or resinous binders (such as coal tars or pitches) are also considered to be Category I ACM.

What are Category II asbestos-containing materials?

Category II ACM includes all other nonfriable ACM, for example, asbestos-cement (A/C) shingles, A/C tiles, and transite boards or panels containing more than one percent asbestos. Generally speaking, Category II ACM is more likely to become friable when damaged than is Category I ACM.

What asbestos-containing materials are regulated under the Asbestos NESHAP?

ACM regulated under the NESHAP is referred to as "regulated asbestos-containing material" (RACM). RACM is defined in 40 CFR 61.141 of the NESHAP and includes: (1) friable asbestos-containing material; (2) Category I nonfriable ACM that has become friable; (3) Category I nonfriable ACM that has been or will be sanded, ground, cut, or abraded; or (4) Category II nonfriable ACM that has already been or is likely to become crumbled, pulverized, or reduced to powder.

Is roofing work classified as a renovation or a demolition?

Normally, roofing work with ACM is classified as a renovation in the Asbestos NESHAP. If roofing work involves wrecking or taking out load-supporting structural members, then the work would be classified as a demolition.

What is a renovation?

A renovation is altering a facility or one or more facility components in any way, including the stripping or removal of Regulated Asbestos Containing Materials (RACM) from a facility component. A renovation could be, but not limited to, any interior renovation or remodel not affecting load-supporting structural members or a roof replacement.

What is a demolition?

A demolition means the wrecking or taking out of any load-supporting structural member of a facility together with any related handling operations or the intentional burning (i.e. practice burns) of any facility.

How much asbestos must be present before the Asbestos NESHAP work practice standards apply to roofing projects?

When a rotating blade (RB) roof cutter or equipment that similarly damages the roofing material is used to remove Category I nonfriable asbestos-containing roofing material, the removal of 5580 ft² or more of asbestos-containing roofing material will create at least 160 ft² of RACM and is subject to the NESHAP. If the removed material is less than 5580 ft² then the removal is not subject to the NESHAP, except that notification is always required for demolitions.

When the removal of Category II nonfriable asbestos-containing roofing material is at least 160 ft² and the removal methods will crumble, pulverize, reduce to powder, or contaminate with other RACM, the removal is subject to the NESHAP.

When the total asbestos-containing roof area undergoing renovation is less than 160 ft², the NESHAP does not apply, regardless of the removal method to be used, the type of material (Category I or II), or its condition (friable versus nonfriable), except that notification is always required for demolitions.

Is an asbestos inspection required prior to the start of a roofing project?

YES. The Asbestos NESHAP requires a thorough inspection for the presence of asbestos prior to the start of all renovations and/or demolitions.

Are roofing projects on single-family private residences regulated by the Asbestos NESHAP?

No.

Is a licensed asbestos contractor required to remove an asbestos-containing roof?

Licensing questions concerning asbestos industry should be directed to the Florida Department of Business and Professional Regulation at http://www.state.fl.us/dbpr/pro/asbest/asb_index.shtml.

What training is required for roofing projects in the Asbestos NESHAP?

Beginning on November 20, 1991, the Asbestos NESHAP requires at least one trained supervisor, such as a foreman or management-level person, employed by the owner and/or operator to be present at any site where RACM is stripped, removed, or otherwise disturbed at any facility which is being demolished or renovated and is regulated by NESHAP. Evidence of the training must be posted and made available for inspection at the demolition or renovation site. Training includes, at a minimum: applicability, notification, material identification, control procedures, waste disposal, reporting and record keeping, asbestos hazards and worker protection.

Every 2 years the trained individual is required to receive refresher training. Information about the training and refresher courses is available from the Florida Department of Business and Professional Regulation at http://www.state.fl.us/dbpr/pro/asbest/asb_index.shtml.

If I have asbestos roofing questions, whom should I contact?

Please contact the [DEP District Office or Local Pollution Control Agency](#) in your area to answer any asbestos roofing questions.