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## Reclaimed Asphalt Roofing Shingles (RAS) Sampling Protocol

### Standard Operating Guidance

<b>Document Number:</b>	2015.2
<b>Applicable Rules:</b>	OAC 3745-20 -01; OAC 3745-20-05
<b>References:</b>	ODOT Supplemental Specification 1116.05

Reclamation of asphalt shingles has increased in the State of Ohio and many stock piles have accumulated without proper documentation of the content. To assure minimal impact on the environment and public safety during the reclamation process, Ohio EPA has developed this Standard Operating Guidance (SOG) for sampling reclaimed roofing shingles for potential asbestos content. This SOG is not intended to ensure compliance with other government agency policies and should be looked upon as a guidance document that assists in compliance with OAC 3745-20 handling and disposal of asbestos material. Other agencies, such as the Ohio Department of Transportation (ODOT), have regulations that need to be considered when recycling reclaimed asphalt shingles (RAS). The facility must remain compliant with its air permit (PTIO); the SOG does not supersede any of the facility permit's terms and conditions. The SOG should be considered in addition to or as a supportive guidance for the facility permit.

- A. Ohio EPA will regulate to assure compliance with the following:
  - 1. Asbestos material, in accordance with OAC 3745-20-01 is not permitted to be reclaimed.
  - 2. Asphalt shingles from NESHAP projects shall have supporting documentation to confirm there is no asbestos material present.
- B. Two sources of asphalt shingles are addressed in this SOG. Those of a known source and those of historically unknown sources of materials.
  - 1. Known Stock Content Requirements (shingles from a known source(s)):
    - a. Assure stock is homogenous and follow terms and conditions listed in the air Permit To Install and Operate (PTIO) and:
    - b. Record Keeping:
      - I. Provide the name of the work site or facility, the mailing address, and telephone number of facility owner where stock was produced.
      - II. Provide documentation that material is not asbestos material such as analysis report(s) as determined using the Transmission Electron Microscopy (TEM) method.
    - c. Sampling:
      - I. Sampling is required before grinding the material.
      - II. Obtain 2 samples per 100 tons or less of stock.
      - III. A Certified Asbestos Hazardous Evaluation Specialist (AHES) license is required for the individual performing the sampling.
      - IV. Random samples are to be obtained (i.e. do not obtain samples only at the top and not only at the bottom).
      - V. Stock that tests positive for asbestos material is to be disposed of in accordance with OAC 3745-20.

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2. Unknown Stock Content Requirements (for existing piles of shingles from unknown source(s)):
  - a. Co-mingled debris is defined as stock that contains other debris from roofing removal such as coal tar epoxy, rubber materials, or other undesirable materials.
    - I. Co-mingled debris is not acceptable for recycling of RAS.
  - b. Non-homogenous RAS of an unknown-origin existing stock is acceptable and can be sampled for recycling. Samples will be collected both pre-grinding and post-grinding to assure no asbestos content:
  - c. Sampling:
    - I. Pre-grinding sampling: two samples per 25 tons or less of stock.
    - II. Post-grinding sampling: two samples per 50 tons or less of stock.
    - III. A Certified Asbestos Hazardous Evaluation Specialist (AHES) license is required for the individual performing the sampling.
    - IV. Stock that tests positive for asbestos material is to be disposed of in accordance with OAC 3745-20.
  - d. Record Keeping:
    - I. Provide documentation that material is not asbestos material such as analysis report(s) as determined using the Transmission Electron Microscopy (TEM) method.

### Contact

For more information, please contact the Division of Air Pollution Control's asbestos program at (614) 644-2270.