
ASBESTOS ROOFING COMMON QUESTIONS
Asbestos Hazard Management Program
Health Hazards Control Unit (HHCU)
North Carolina Department of Health and Human Services

1. When is a permit required for the removal of regulated asbestos containing roofing materials?

A permit is required for the removal of asbestos containing asphalt/bituminous roofing products and asbestos cement shingles/panels under the following conditions:

- (1) ≥ 160 square feet of friable asbestos containing roofing materials will be removed.
- (2) ≥ 5580 square feet of nonfriable asbestos containing materials such as built up roofing will be removed using a rotating blade cutter.
- (3) ≥ 160 square feet of nonfriable asbestos/cement roofing products will be removed using techniques that will create friable asbestos containing material (ACM).

NOTE: Friable ACM means the material has been crumbled, pulverized, reduced to powder, or has otherwise deteriorated so that the asbestos is no longer likely to be bound within its matrix.

2. What paperwork must be submitted prior to removing regulated asbestos containing roofing materials?

An Asbestos Permit Application and Notification for Demolition/Renovation (DHHS 3768) must be submitted to the NC HHCB ten (10) working days prior to starting the removal of regulated asbestos containing roofing material.

Also, within 45 calendar days from the completion date stated on the permit, the owner or his representative must submit a completed Waste Shipment Record (DHHS 3787) to the NC HHCU.

3. How do you calculate permit fees for the removal of regulated asbestos containing built-up roofing material?

The amount of regulated asbestos containing built-up roofing material created during removal is calculated based upon information found in the NESHAP Interpretative Rule Governing roof removal Operations (40 CFR 61, Subpart M, Appendix A). This Rule states that 160 square feet of regulated asbestos containing material is created for each 5580 square feet of built-up roofing material cut by a rotating blade cutter.

Fees for the removal of regulated asbestos containing roofing materials are 1% of the contract price or \$.10 per square or linear foot, whichever is greater. The fee is not based on the put-back of new materials. To calculate the square foot fees, divide the total square footage of the roof by 5580. Multiply this number by 160. The resulting number is then multiplied by \$.10 to get the total permit fee. See example below:

$$\begin{aligned} \text{Built-up Roof area} &= 22,320 \text{ square feet} \\ 22,320/5580 &= 4 \\ 4 \times 160 \times \$.10 &= \$64.00 \end{aligned}$$

4. How do you calculate permit fees for the removal of regulated asbestos cement shingles/panels?

The fees are based upon the tear-off and disposal of regulated asbestos containing cement shingles/panels but not the put-back of new materials. The procedure for calculating the square footage fees for regulated asbestos containing cement shingles/panels is 1% of the contract price or \$.10 per square foot, whichever is greater. See example below:

$$\begin{aligned} \text{Asbestos cement shingle/panels roof area} &= 1000 \text{ square feet} \\ 1000 \times \$.10 &= \$100 \end{aligned}$$

Asbestos Roofing Common Questions

5. **Are permit fees always required for removing asbestos built-up roofing materials or asbestos cement shingles/panels?**
No. Permit fees are not required if you are removing less than the threshold amounts of regulated asbestos containing materials listed in questions #1. Permit fees are not required for the removal of asbestos containing built-up roofing material when manual techniques (axes, knives, etc.) are used. Also, permit fees are not required when asbestos cement shingles/panels are removed intact.
6. **Who must be accredited to remove regulated asbestos containing built-up roofing materials or regulated asbestos cement shingles/panels?**
The asbestos roofing supervisor and anyone handling the regulated asbestos containing roofing material. This would typically include anyone operating a rotating blade cutter or HEPA vacuum, wetting the regulated material, bagging the regulated waste, or placing the regulated waste into a container for transportation to the disposal site.
7. **When would an individual not have to be accredited by the NC HHCU?**
When removing less than the threshold amounts stated in question #1. When using manual techniques (i.e. axes, knives, etc.) for the removal of asbestos built-up roofing material. When removing asbestos cement shingles/panels intact or when the material does not become regulated.

Please note that the OSHA Asbestos Construction Standard, 29 CFR 1926.1101, requires every individual involved in the removal of asbestos containing roofing products to have asbestos training. For additional information on OSHA requirements, contact the North Carolina Department of Labor at 1-800-LABOR-NC.
8. **Does the accredited asbestos roofing supervisor have to stay on site during the removal of regulated asbestos containing roofing material?**
An accredited asbestos roofing supervisor shall be on site at all times when the removal of regulated asbestos containing roofing material is being conducted.
9. **Does the accredited asbestos roofing supervisor have to stay on site during the removal of nonregulated asbestos containing roofing material?**
No. However, the OSHA Asbestos Construction Standard, 29 CFR 1926.1101, requires a competent person, who has been asbestos trained, to make on-site inspections at "intervals sufficient to assess" whether conditions have changed and at any reasonable time an employee requests such an inspection. For additional information on OSHA requirements, contact the North Carolina Department of Labor at 1-800-LABOR-NC.
10. **Can the accredited asbestos roofing supervisor make a decision to remove regulated asbestos containing roofing material without wetting the material if it is not feasible or it will create a safety hazard?**
The National Emission Standard for Hazardous Air Pollutants (NESHAP) for asbestos requires prior written approval for removal of regulated asbestos containing material without wetting. The person requesting approval for dry removal must submit a written application along with all pertinent data justifying the need for dry removal to the Health Hazards Control Unit. However, in the four (4) counties with Local Air Pollution Control Programs (Forsyth, Mecklenburg, Buncombe), a written application for dry removal should be submitted to the local asbestos coordinator.

For additional information on OSHA requirements, contact the North Carolina Department of Labor at 1-800-LABOR-NC.
11. **Can an accredited asbestos roofing worker perform asbestos abatement work?**
No, an accredited asbestos roofing worker is limited to Class II activities involving the removal of asbestos containing roofing products.
12. **Can an accredited roofing supervisor perform asbestos abatement work?**
No, an accredited asbestos roofing supervisor is limited to Class II activities involving the removal of asbestos containing roofing products.

13. **Can an accredited asbestos roofing supervisor perform an asbestos roof inspection, including the collection of bulk samples?**

Yes, but the inspection is limited only to roofing products and shall not include other suspect materials such as pipe insulation, HVAC insulation, cooling towers, etc.

Please note that the tear-off and replacement of roofing materials may dislodge spray-applied asbestos containing fire-proofing from the building's roof deck and beams. It is strongly recommended that an asbestos survey be conducted below the roof deck by an accredited asbestos inspector prior to beginning roofing activities. The accredited asbestos inspector could also sample other suspect materials which may be located on the roof.

14. **Are there other references that discuss roofing issues and regulatory requirements?**

Yes, a summary document entitled, *"The Guidance On The Regulatory Requirements For Conducting Asbestos Containing Roofing Work In North Carolina."* This document is available from the NC HHCUC upon request. To contact NC HHCUC call (919) 707-5950.