

Minnesota Pollution Control Agency

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May 15, 2009

To potential asphalt shingle recyclers:

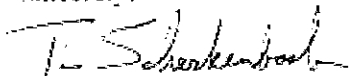
This letter states the Minnesota Pollution Control Agency's (MPCA) guidelines for inspecting and sampling for the presence of asbestos-containing materials (ACM) for the supply and processing of recycled asphalt shingles. These guidelines only apply to the 2009 season of supply and processing of recycled asphalt shingles.

The MPCA acknowledges that asphalt shingles are a suspect ACM, but due to extensive existing data, the MPCA believes that asphalt shingles from single layer tear-off roofing projects are unlikely to contain asbestos. The minimum sampling frequency and protocol that can be found in the "MPCA Shingles Recycling QA/QC Protocol" is recommended based on extensive data from around the United States and Midwest region of the United States. This data was provided in the "Integrated Waste Consulting Services" report (by Tim Townsend et. al.; October 2007) and by other industry reported data from April 2009. These reports showed that only 0.4 percent out of 97,246 samples taken contained asbestos. None of the samples that contained asbestos were observed in the Midwest region of the United States.

The MPCA believes that sampling one out of every fifty tons of asphalt shingles will generate sufficient data to conclude whether asbestos-containing asphalt shingles are still present in Minnesota's waste stream. The shingle recycler may elect to sample more frequently than once every 50 tons of incoming material. The MPCA will compile this data for further review. If the data collected from the 2009 season further supports the MPCA's current belief on this issue, then the MPCA will propose a reduction or elimination of sampling requirements for future seasons of supply and processing of recycled asphalt shingles. If the data from the 2009 season conflicts with current data, then more stringent sampling requirements will be implemented for future seasons of supply and processing of recycled asphalt shingles.

If you have any questions regarding shingle recycling, please contact Wayne Gjerde at 651-757-2392 or Don Kyser at 651-757-2512. If you have any questions regarding ACM, please contact Derek Pemble at 651-757-2647.

Sincerely,



Tim Scherckenbach
Deputy Commissioner

TS-DP:rh

cc: Jeffrey Bratko, Region 5 EPA
Tim Scherckenbach, MPCA
Jeff Smith, MPCA
Jeff Connel, MPCA
Gary Palford, MPCA
Heidi Kroening, MPCA
Katie Koelgen, MPCA
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