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North Carolina Department of Environment and Natural Resources  
Division of Waste Management

Beverly Eaves Perdue  
Governor

Dexter R. Matthews  
Director

Dee Freeman  
Secretary

October 4, 2010

Mr. David Glover  
Asphalt / QC General Manager  
Barnhill Contracting Company  
P. O. Box 1529  
Tarboro, NC 27886

Subject: Solid Waste Permit Requirements for Asphalt Roofing Shingle Scrap  
Barnhill Contracting Asphalt Plant, Permit No. 33F  
Rocky Mount, Edgecombe County, Document ID 11722

Dear Mr. Glover:

I apologize for the delay in responding to your request concerning solid waste permitting for asphalt shingles. I have included a recently completed document that summarizes the solid waste permit requirements for facilities interested in collecting, sorting, and processing asphalt shingle roofing scrap waste. It contains two flow sheets to aid in determining whether a solid waste permit is needed and specific instructions for an application.

“Residential Tear-Off Shingle Scrap” is a construction and demolition (C&D) waste. While it is comprised mainly of shingle scrap, it can contain other roofing scrap such as recyclable metal, nails, plastic wrap, and wood from repaired or new framing, roofing sheeting, or other dimensional lumber. Training roofers to separate the shingle scrap from other waste while cleaning up at a job site is a good practice that reduces separation and disposal efforts at the transfer or processing facility, however, it does not change the classification as a C&D waste. As such, the facility that receives this waste must be permitted as a solid waste facility that includes the management of the residential tear-off shingle in their approved operation plan. Your permit is for a land clearing and inert debris (LCID) landfill and does not include receiving or processing C&D waste or residential tear-off shingle scrap.

If you plan to both receive and process shingles, you should refer to the guidance for a processing facility. You may view an approved application and permit by visiting our web site, <http://portal.ncdenr.org/web/wm/sw>, and selecting “Documents (Tracker)” in the left hand column and entering “Boggs Paving” in the search block. Document No. 8165 is the application and Document No. 8166 is the permit. You do not need to duplicate information that was supplied in your LCID landfill application, but you should note of previously supplied information in your application. It should be submitted as a modification to your LCID permit.

Mr. David Glover  
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If you have any questions, please contact me at (919) 508-8520 or by email at [pat.backus@ncdenr.gov](mailto:pat.backus@ncdenr.gov).

Sincerely,

A handwritten signature in cursive script that reads "Pat Backus".

Patricia Backus, P.E.  
Environmental Engineer  
Solid Waste Section

cc: Ed Mussler, DWM  
Ben Barnes, DWM  
Jeff Dellinger, Health Hazards Control Unit, NC DHHS  
Christie Barbee, Executive Director, Carolina Asphalt Pavement Association