



Environmental Services Division  
Land Quality Bureau, Solid Waste Section  
Iowa Department of Natural Resources

## MEMO

---

**DATE:** March 25, 2010

**TO:** File

**FROM:** Kirsten Duke, Environmental Specialist

**SUBJECT:** Asphalt Shingle Recycling; No Sanitary Disposal Project Permit Required

Numerous entities approaching the Iowa Department of Natural Resources (IDNR) Solid Waste Section (SWS) during the past year to discuss asphalt shingle recycling in our state has resulted in the decision that no sanitary disposal project (SDP) permit is needed to conduct source separated recycling. This decision is supported by the IDNR's historical position of not requiring a SDP permit for can redemption centers, wood shaving companies, and paper-plastic- glass-metal recycling centers.

Many different SDP permitting options were discussed throughout the year. Regulatory meetings were held with the Iowa Department of Transportation (IDOT), Iowa Workforce Development (IWD), Iowa Department of Economic Development (IDED) and IDNR Air Quality Bureau (AQB). Subsequently, while the SWS tried to determine permitting requirements, internal discussions led to assistance from the IDNR Legal Bureau for interpretation of Iowa Administrative Code (IAC) 567 Chapters. Legal Bureau staff confirmed that collecting and processing of source-separated material for recycling purposes does not constitute a sanitary disposal project.

Initially, the IDNR's decision to permit this type of operation was due to the unknown waste/residuals/deleterious materials associated with the process. Even in those instances where shingles are separated at the source and destined for recycling, the IDNR acknowledges that some amount of deleterious waste (roofing felt, shingle rap, flashing) will be included with shingle loads. This occurs with other single stream recycling process as well. No rule currently exists within the solid waste regulations to determine the amount of deleterious material that is "too much", constituting a solid waste processing SDP. Extraneous materials should be minimized to the maximum extent possible. Until such time that a rule is put in place, a case-by-case decision will need to be made by IDNR enforcement staff in those instances when the amount of deleterious materials becomes excessive.

For persons interested in additional information, contact Kirsten Duke at (515) 281-3302 or [Kirsten.duke@dnr.iowa.gov](mailto:Kirsten.duke@dnr.iowa.gov)