

# Intentional Burning of Structures for Fire Training

Utah DAQ/ATLAS Section 195 North 1950 West PO Box 144820 Salt Lake City, Utah 84114-4820 Phone (801) 536-4000 Email: asbestos@utah.gov http://www.asbestos.utah.gov Intentional burning of structures for fire training is allowed by the Division of Air Quality (DAQ), however, there are certain DAQ regulations that apply.

The burning of two structures per year by organized and operating fire departments for the purpose of training fire service personnel are exempt from the General Burning requirements contained in the Utah Administrative Code (UAC) <u>R307-202</u>, but other regulations still apply.

### **Requirements Prior to Intentional Burning**

#### Asbestos

Asbestos is known for its unique properties of being resistant to abrasion, inert to acid and alkaline solutions, and stable at high temperatures. Because of these attributes, asbestos was widely used in construction and industry.

When Asbestos Containing Material (ACM) is damaged or disturbed, as in burning, it releases fibers into the air.

Once inhaled, the small, inert asbestos fibers can easily penetrate the body's defenses. They are deposited and retained in the airways and tissues of the lungs and cause lung scarring and lung cancer.

### Asbestos requirements

• Inspect the structure for the presence of asbestos-containing materials (ACM) (<u>40 CFR</u> <u>61.145(a)</u> and UAC <u>R307-801-9 and R307-801-10</u>))

The inspection must be conducted by a Utah certified asbestos inspector (UAC  $\underline{R_{307}-801-}$ <u>6</u>, working for a Utah certified asbestos company  $\underline{R_{307}-801-5}$ )

An inspection survey report must be generated (UAC R307-801-10(6))

The inspection survey report must remain on site throughout the demolition (UAC R307-801-9).

• All asbestos-containing materials must be removed prior to intentionally burning a structure. This includes asbestos-containing materials that can remain in place during normal demolition operations (40 CFR 61.145(c)(3)(B)(10) and UAC R307-801-11(1)(b)).

This includes: asbestos containing insulation, duct tape, textured ceilings, and resilient floor coverings, roofing materials, packings, gaskets, etc., asbestos-cement shingles, and siding.

Removal of Regulated ACM must be performed by a Utah certified asbestos contractor and certified asbestos workers (UAC R307-801) This information is available on the <u>DAQ</u> asbestos website.

- A notification must be submitted to the Utah DAQ 10 working-days prior to demolishing the structure (40 CFR 61.145(b) and UAC R307-801-11).
- If the preparation of the structure for burning requires the removal of greater than 160 square feet of ACM or 260 linear feet of ACM pipe insulation, notification is required 10 working days prior to removing the ACM (40 CFR 61.145(b) and UAC R307-801-11).

- If there are less than 160 square feet or 260 linear feet of ACM in the structure, then notification of asbestos removal is required 24 hours prior to removing the ACM. (UAC R307-801-11(1)(b)).
- The burning of structures for fire training is an institutional use of the structure and falls under the commercial notification fees established for the Department of Environmental Quality.

## Prior to burning, it is required that you check the Utah Clearing Index

The Clearing Index is an Air Quality/Smoke Dispersal Index used to regulate open burning and as input for other air quality decisions throughout Utah. The Clearing Index is defined as the Mixing Depth (depth of the mixed layer in 100s of feet above ground level) multiplied by the Transport Wind (average wind in the mixed layer in knots). Clearing Index values below 500 are considered poor ventilation and open burning is restricted under these conditions.

An index of 500+ is required before burning can be done. (R307-202-1(4)).

To access the current clearing index, please check the Utah clearing index.

Following the burning of the structure for training, the fugitive dust and dust control requirements of R307-205 and R307-309 apply to the loading of the remaining building debris and to clearing and leveling activities at the site of the structure.

The Statewide rule R307-205 requires dust control when clearing land over 3 acres in size.

The Non-Attainment Area Dust Control Rule R307-309 requires the submission of a dust control plan to the Executive Secretary for any activity which has the potential to produce fugitive dust. (Non-Attainment Area includes: Utah, Salt Lake, Davis Counties, Ogden City.)

• The DAQ also recommends that before intentional burning notification of nearby residents be made to alleviate any undue concerns. This will allow the residents to close windows and to make arrangements to leave the area if necessary, especially those who are sensitive to smoke and dust, those who have asthma, or those with respiratory or heart problems.

#### **Questions?**

Contact the **Utah DAQ at: (801) 536-4000** for asbestos inspector and contractor lists, forms, and information about rules, or see our web page: <u>asbestos.utah.gov</u>