# Intentional Burning of Structures for Fire Training

Utah Division of Air Quality



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Intentional burning of structures for fire training is allowed by the Division of Air Quality, however there are certain Air Quality 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) R307-202, but other regulations still apply.(UAC R307-202-1)

### **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) (40 CFR 61.145(a) and UAC R307-801-9))

 $\square$  The inspection must be conducted by a Utah certified asbestos inspector (UAC R307-801-10)

An inspection survey report must be generated (UAC R308-10(6))

 $\square$  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)(d)).

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 Asbestos website: www.deq.utah.gov/eqair/haps/asbestos/index.htm

A notification must be submitted to the Executive Secretary of the Utah Air Quality Board 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 website at: www.wrh.noaa.gov/Saltlake/climate/clearingIndex.html or call the Division of Air Quality at (801) 536-4000.

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.

 $\square$  The Statewide rule R307-205 requires dust control when clearing land over 3 acre in size.

The NonAttainment 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. (NonAttainment Area includes: Utah, Salt Lake, Davis Counties, Ogden City.)

The Division of Air Quality 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 make arrangements to leave the area, especially those who are sensitive to smoke and dust, those who have asthma, or those with respiratory or heart problems.

## **Questions?**

Contact the **Utah Division of Air Quality at:** (801) 536-4000 for asbestos inspector and contractor lists, forms, and information about rules, or see our web page:

http://www.airquality.utah.gov/haps/asbestos/index.htm