



# NEBRASKA DEPARTMENT OF ENVIRONMENTAL QUALITY

## ENVIRONMENTAL GUIDANCE DOCUMENT

03-136

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### **Policies and Guidelines For Fire Training Exercises**

The purpose of this document is to outline the environmental requirements for fire training exercises. Structures demolished by intentional burning are subject to the asbestos regulations, national emission standards for hazardous air pollutants (NESHAP) found in 40 Code of Federal Regulations (CFR) Part 61 Subpart M. These are adopted in Title 129 of the Nebraska Air Quality Regulations. State, Local, Industrial and Rural Fire departments who burn residential structures or buildings for fire training must comply with the Air Quality Regulations. Guidance documents and forms for asbestos can be found on the Department website at: [www.deq.state.ne.us](http://www.deq.state.ne.us). The following is a summary of the requirements (also see Figure 1, Fire Training Responsibility Flow Diagram)

**Fire Department Responsibilities** – When the fire department takes control of a structure, they are required to:

1. Conduct a thorough inspection for asbestos
2. Submit a completed Nebraska Fire Training Demolition Notification to the Nebraska Department of Environmental Quality (NDEQ), Air Quality Division
3. If asbestos is present after taking control of the structure, remove all regulated asbestos containing material (RACM) prior to fire training

### **Property Owner Responsibilities**

1. Following the fire training exercise, properly dispose of ash and residue

Note: Residential homeowners (four or less dwellings) are not subject to the NESHAP and can remove asbestos prior to the fire departments taking control of the structure. However, the Department encourages proper procedures and protective equipment be used.

### ***Detailed Guidelines***

1. Taking possession: The fire department becomes the operator for NESHAP purposes when they take possession of a building and become subject to the asbestos requirements. For example, an agreement with the property owner or other authority, such as from the city for abandoned properties, would qualify as transfer of authority to the fire department.
2. Inspections: To meet the "thorough inspection" requirement, all suspect asbestos-containing materials must be identified, sampled and laboratory analyzed or must be assumed to contain asbestos, and removed. Suspect asbestos-containing materials include floor tile, linoleum, pipe and boiler insulation, heat duct wrap and joint tape, cementitious siding and roofing, asphalt-based roofing, ceiling tiles, joint compound, sprayed-on-texturing, etc. See [Figure 2](#) for schematic examples.

3. Notification: Fire departments must submit a "Nebraska Fire Training Demolition Notification" to NDEQ 10 working days prior to the training exercise or if asbestos is present, prior to any removal activity that would break up, dislodge or disturb the asbestos material. Working days are Monday through Friday and not weekends or holidays. The notification can be mailed, express delivered or hand delivered to the NDEQ (this demolition notification does not combine with, supersede, or replace any or all of those permit documents required by the State Fire Marshal's Office or State Health and Human Services to conduct a Live Fire Training Exercise).
4. Removal: Asbestos must be removed prior to demolition or in this case, intentional burning if the building or structure has more than 260 linear feet of RACM, 160 square feet of RACM, or 1 cubic meter of RACM. When burning a building or structure all ACM is considered RACM. The State of Nebraska Health & Human Services (HHS) Asbestos Control Program has stricter requirements. For information regarding HHS regulations call (402) 471-2133.
  - a. Use procedures to control emissions during removal
  - b. Adequately wet the RACM during removal
  - c. Double bag RACM waste
  - d. Glove bags may be used
  - e. Use local exhaust ventilation
  - f. Remove all RACM, Category I and Category II materials prior to burning
1. Ash & Residue Disposal: Once a structure has been destroyed by fire, the ashes and residue must be managed properly according to the Integrated Waste Management regulations. Only brick, concrete block and concrete rubble may be left on the site or used for beneficial fill. Any ashes and remaining structure residue (wood, shingles, metal, furniture, plastic, glass, tile) must be cleaned up and hauled to a permitted municipal solid waste landfill for disposal. (Also see [Permitted Facility List](#) in the Integrated Waste Management Program and "[Disposal of Construction and Demolition Waste](#)" Factsheet Publication on the NDEQ Web Page)

### ***Why the requirements?***

It is important to follow these guidelines in order to ensure that the public health and the welfare of the fire fighters conducting the training are protected from asbestos exposure. When some types of asbestos are burned, its matrix is broken down and fibers are more easily released causing an inhalation hazard. Asbestos fibers will remain in the air almost indefinitely and can travel long distances. For more information regarding asbestos see the "General Asbestos Information" Guidance Publication on the NDEQ website at: [www.deq.state.ne.us](http://www.deq.state.ne.us).

Note: other State of Nebraska regulations may apply. The Nebraska Health & Human Services asbestos control/AHERA program also has asbestos regulations and licensure requirements for working with asbestos in Nebraska.

Figure 1.

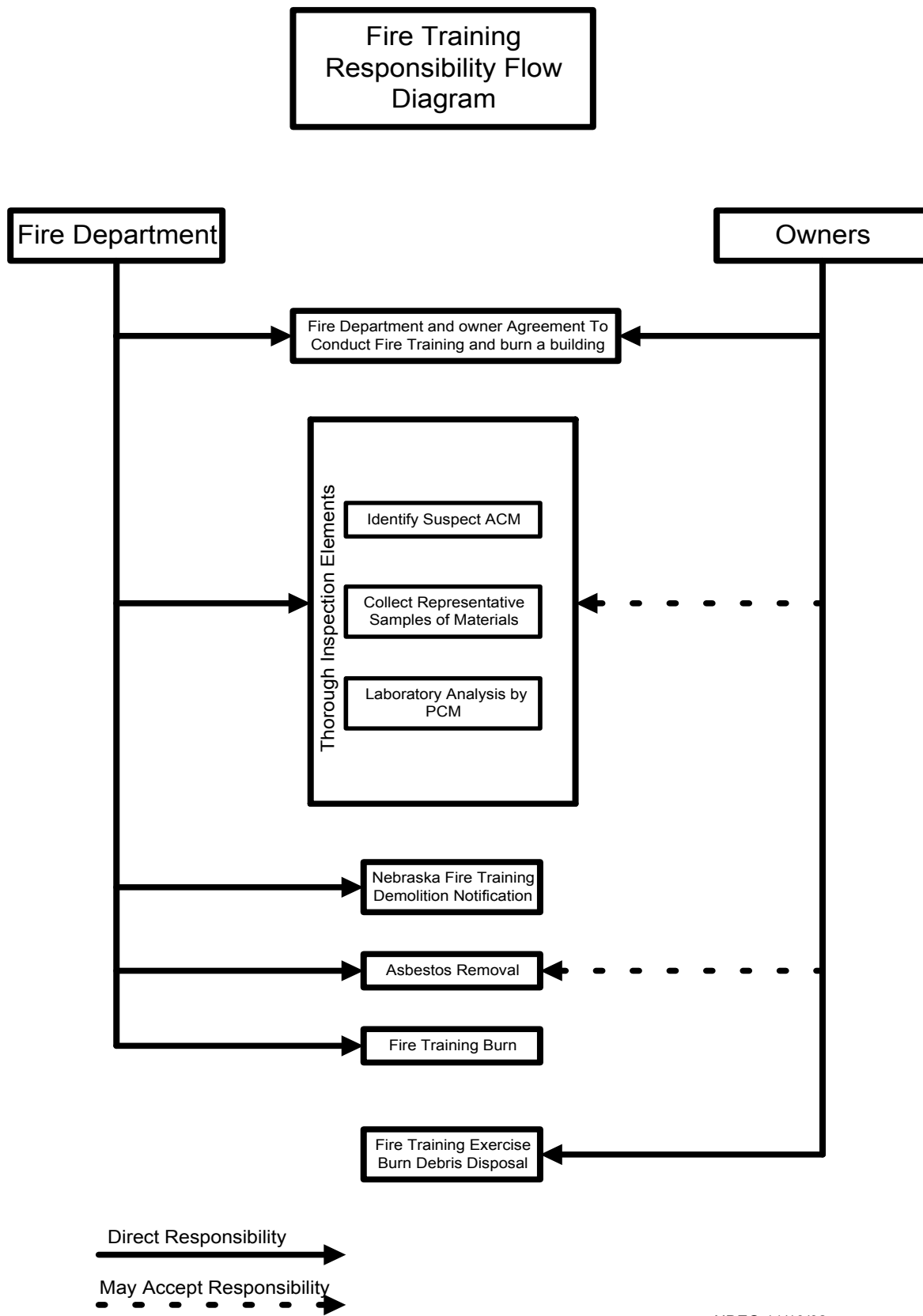
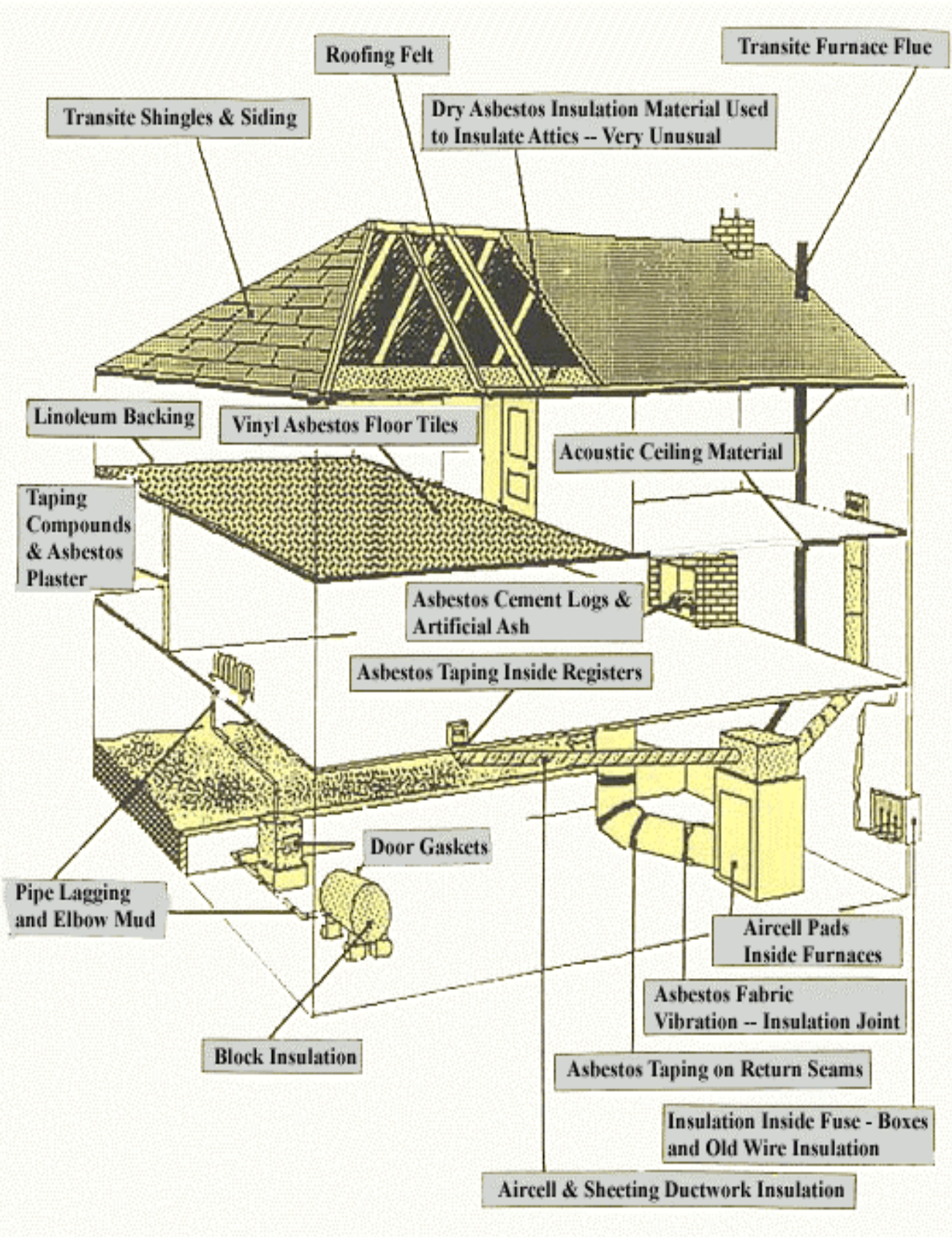


Figure 2.



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