

Vermont Department of Environmental Conservation

Fire Training Fact Sheet – Acquired Structures

In order to provide training, fire departments burn structures such as commercial buildings and residential homes that are to be demolished. Situations where these structures are legally burned as part of a supervised fire training exercise are invaluable to fire department personnel. This fact sheet details the steps fire departments should take to minimize potential exposure to toxic fumes and hazardous materials.

Vermont DEC Air Quality and Climate Division requires a “Fire Training Notification Form” be submitted at least 14 days prior to the training drill.

Vermont Department of Conservation (VT DEC) open burning rules prohibit the burning of any structure unless it is for fire training purposes. The intentional burning of a structure is considered demolition and requires a thorough inspection to determine the presence of asbestos and other hazardous materials. Fire departments must provide notification, follow specific work practices, and ensure proper disposal of regulated material.



Fire Training Instruction

The burning of a structure must be used for instructional purposes, and should not be used for inexpensive demolition. The VT DEC defers to the latest guidelines set forth in the National Fire Protection Association’s (NFPA) publication 1403: *Standard on Live Fire Training Evolutions, Chapter 4, Acquired Structures*.

Burning solely for the inexpensive disposal of demolition debris is not considered fire training and would be a violation of Vermont’s open burning rules, thereby subjecting the violator to enforcement action.

If these instructions and guidelines are not being followed, the burning would not be considered to be fire training, and would be subject to VT DEC open burning regulations.

Asbestos Assessment

Asbestos is not destroyed by fire but the materials that bind the asbestos fibers together are. Once the binding materials are destroyed, the asbestos fibers are released and may be inhaled. It is vital that all asbestos-containing material be removed prior to burning the structure to protect firefighters and citizens alike.

Asbestos Containing Materials must be removed from the building prior to fire training.

Prior to impacting building materials or conducting the burning, the building must be surveyed for asbestos containing materials (ACMs) by a Vermont-certified Asbestos Abatement Contractor. If ACMs are found they must be removed by a Vermont-certified Asbestos Abatement Contractor. **All acquired structure fire trainings require EPA notification under 40 CFR 61 M.** The building owner must complete the NESHAP notification form located at <http://healthvermont.gov/enviro/asbestos/asbestosregulatoryprogram.aspx> and submit the original to the EPA and a copy to the Vermont Department of Health.

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Notifications

In addition to the aforementioned EPA and VT Department of Health notifications, the regional Fire Warden must be notified. **Fire departments must also submit a Fire Training Notification Form to Vermont DEC at least 14 days prior to the training drill.** The notification form and more information about fire training requirements can be found at <http://dec.vermont.gov/air-quality/compliance/fire-training>.

VT DEC recommends that neighbors within a ½ mile of the training site are notified of the training prior to the burn.

The VT DEC also recommends that fire departments notify nearby residents of the time and date of the training and encourages a careful evaluation of the training site prior to the exercise. Sites in more rural areas without nearby

neighbors are preferred as they are less likely to impact citizens and/or cause a nuisance.



Toxic Air Contaminants

In order to minimize the generation of toxic air contaminants (and for the safety of the trainees), the following materials should be removed to the greatest extent possible prior to the training exercise: asphalt, vinyl, rubber, plastic, appliances, pressure treated wood, curtains, carpeting, linoleum, shingles, and other synthetic materials; siding trim coated with lead paint; and any mercury containing fluorescent bulbs, thermostats,

and switches. These materials, along with any ash remains, shall be handled with care and disposed of at a certified solid waste management facility. Due to the toxicity of mercury, it is required that mercury containing products be separated from that solid waste for management as hazardous waste or universal hazardous waste. Solid waste district information and phone numbers can be found at http://www.anr.state.vt.us/dec/wastediv/solid/pubs/solid_dist.pdf.

Prior to the fire training, the following items and materials should be removed:

- Vinyl, rubber, plastic
- Appliances
- Pressure treated wood
- Carpeting, curtains
- Linoleum
- Shingles
- Trim coated with lead paint
- Mercury-containing fluorescent bulbs, thermostats, and switches

Checklist

- **Asbestos survey complete followed by abatement if needed**
- **Building Owner complete and submit the NESHAP notification form to USEPA Region 1.**
- **Contact the Vermont Department of Health and include a copy of the NESHAP notification.**
- **Complete and submit “Fire Training Notification Form” to the Vermont DEC Air Quality and Climate Division at least 14 days prior to the fire training.**
- **To the greatest extent possible, clear the proposed fire training facility of all potentially hazardous items.**
- **Notify the local Fire Warden of the proposed fire training.**
- **Notify residents within ½ mile of the proposed fire training**

Contacts

If you have questions or concerns, you can contact Brian Monroe in the VT DEC Air Quality and Climate Compliance staff Section at brian.monroe@vermont.gov or (802) 338-2047. For questions related to the asbestos inspection and abatement policy, please call the Vermont Department of Health at (802) 863-7382.