

**WESTERN PLACER COUNTY FIRE CHIEFS'
ASSOCIATION**

**COMPLIANCE GUIDE FOR
CONDUCTING LIVE FIRE SAFETY
TRAINING BURNS**



**WESTERN PLACER COUNTY
FIRE CHIEFS ASSOCIATION**

***Dedicated to ensuring the conduct of safe
live fire safety training.***

Developed through the cooperative efforts of:

Placer County Air Pollution Control District

**Western Placer County Fire Chiefs Association
and Training Officers Association**

United States Environmental Protection Agency

and the

California Air Resources Board

2007

INTRODUCTION

This guide is designed to assist Placer County fire agencies in establishing a comprehensive and methodological approach to safely and legally acquire vehicles, unimproved lots, or structures as well as the permits needed to conduct live fire safety training exercises.

The guide outlines the steps necessary to apply for all required regulatory agency permits, and provides copies of all forms needed to notify agencies (local, state, and federal) prior to any controlled burning of a salvaged vehicle, wildland fire training, or vacant structure fire training.

Reviewing the documents contained herein and following the proper procedures will save both the property owner and your agency time and money (such as six months in jail and a levied fine!).

Following the procedures set forth in this document, before you strike a match, is not only a must for safety and limiting liability; moreover, it is the **LAW**.



Safety and Compliance

I. VEHICLE LIVE FIRE SAFETY TRAINING

Vehicle live fire safety training is invaluable in ensuring firefighters learn the safe tactics to be used in high frequency/high-risk incidents. However, the conduct of training requires legal compliances and notifications that are similar for both vegetation and structure live fire safety training.

Proper preparation of a salvaged vehicle for live fire safety training must meet the following criteria.

1. **Vehicle Registration:** As often as possible, have a salvage yard receive the donated vehicle(s) and clear the title for salvage. The salvage yard can then “donate” the vehicle(s) to the training authority.
2. **Hazardous Materials:** Be certain that all hazardous materials such as batteries, crankcase oil, and transmission fluid are removed from the vehicle, and that the radiator and front and rear differentials are drained. Ensure there are no bulk containers in the cargo and passenger areas, the drivelines and shock assist devices on hatchbacks are removed, and the interior upholstery is removed. Ensure that the front and rear bumpers are inspected for hydraulic cylinder fluid and if present, dispose of it properly.
3. **Tires:** If the vehicle is to be towed, leave a set of good tires and wheels on one axle for the tow. Otherwise either pull the wheels or release the air out of the tires to prevent a tire explosion and/or the unintentional movement of the vehicle.
4. **Fuels:** Only ordinary combustibles or plumbed gas pipes fed by propane with a safety shut-off assembly are to be used as live fire fuels. Do not use flammable liquids.
5. **Safety Briefing:** A tailgate safety session shall be conducted prior to training. An Incident Action Plan is the recommended planning tool for safety.
6. **Notices:** A ten working days notice is required and to be sent to the Environmental Protection Agency (EPA) and the California Air Resources Board (see ATTACHMENT I).
7. **Permits:** An Air Pollution Permit is required for burning vehicles or for fire safety training. Notification of neighbors and local and CAL FIRE PSAPs is recommended.

II. VEGETATION LIVE FIRE SAFETY TRAINING

The controlled burning of cut or standing vegetation for live fire attack methods training is a critical part of all wildland firefighter safety training. All laws, codes and safety procedures and planning requirements shall be complied with prior to executing any live fire training.

Listed below are the minimum requirements for a wildland live fire safety training exercise.

1. **Land Use:** The property owner must provide written permission to use the land for live fire safety training. The fire agency must ensure there is no crop insurance on the parcel.
2. **Liability:** The sponsoring fire agency having jurisdictional authority must have the property owner sign a Release of Liability prior to entering the property with personnel and equipment.
3. **Hazards:** All hazards such as power lines, cisterns/septic systems, ditches, old fences, exposures, and nearby bales of vegetation, have been identified. In addition, access limitations, rocky or wet areas, hazardous materials storage, asbestos containing materials (pipes and propane tanks), nearby housing, community buildings, parks with participants and any other debris or activities that would not be conducive to your equipment. All personnel must be clearly identified.
4. **Permits:**
 - a. **APCD:** A burn permit from the Air Pollution Control District is required prior to burning. There is a nominal fee for burning in the Sacramento Valley Air Basin (west of Clipper Gap).
 - b. **CAL FIRE:** CAL FIRE requires a burn permit in the unincorporated areas during the burn restriction season that normally starts on the first day of May and ends on the first day of November. This CAL FIRE permit is free. Contact your local CAL FIRE office for more information.
5. **Notifications:** Notify all agencies and community areas as prescribed herein and place proper signage in the training area to minimize false-alarm calls.

COMPLIANCE GUIDE TO CONDUCTING LIVE FIRE SAFETY TRAINING BURNS

6. **Planning:** It is highly recommended that you complete an Incident Action Plan (IAP) utilizing the incident command system. The IAP will assist with covering all areas of concern in your planning process as well as help determine needed personnel resources. The IAP should include post live fire mop-up and patrol prior to returning the area to the property owner.
7. **Safety:** Conduct a tailgate safety session with all personnel prior to the training. Utilize an IAP for assistance to ensure training objectives are covered.
8. **Test Burn:** Conduct a small test burn to observe the expected fire behavior. Be sure to have a charged hose line in place prior to burning. The **minimum** water flow for any live fire safety training should be 100 gallons per minute.

BURN PRESCRIPTION

A Vegetation Live Fire Burn Prescription is designed to assist you in the decision-making process prior to executing the live fire portion of your safety training exercise. On the following page is an example of a burn prescription information sheet. Review the prescription criteria closely.

Remember... DO NOT BURN if any of the observed conditions fall outside the prescribed parameters.

Burn to Learn

VEGETATION LIVE FIRE BURN PRESCRIPTION

FUELS: *Grass (Example)*

FIRING/CONTROL CONSIDERATIONS:

Backing and strip burning techniques will be utilized for this live fire training burn. Be cognizant of winds and smoke transport. Observe smoke impacts on adjacent roads. Control traffic on roads if necessary.

WEATHER AND FUEL MOISTURE:

1. **WEATHER DATA COLLECTION:**

a. Location(s) of Data Collection

On site weather will be taken using a belt weather kit. In addition, the two closest RAWS (Remote Automated Weather Stations) stations shall also be monitored. The Lincoln RAWS is located in the town of Lincoln, approximately 4 miles northeast of the project at 119 feet in elevation. The Secret Town RAWS is located approximately 19 miles northeast of the project at 3100 feet in elevation. A spot weather forecast will be obtained from the Redding Interagency Fire Forecast and Warning Unit.

b. Data Collected

Relative humidity, max/min temperatures, continuous wind speed and direction, and 10 hr. fuel stick fuel moisture content (RAWS).

c. Sampling Period

The RAWS data for the previous two days will be obtained. In addition, on site observations with the belt weather kit will be made periodically throughout the burn.

d. Forecasts

Spot forecasts will be obtained with special emphasis on possible wind shifts, cumulus build-ups, and dry cold front passage.

e. Forecasting Entity

Redding Interagency Fire Forecast and Warning Unit, through the Grass Valley ECC dispatch center will be contacted for forecasts. phone: (530) 226-2730 for Redding. A wind transport forecast may also be obtained.

f. Specifications, Warnings

The burn will not take place if there are indications of strong cumulus cloud build-up, the possibility of a dry cold front moving through the general area of the project and/or gradient winds shifting from the North or East.

g. Spare the Air Days

No burning shall occur on Spare the Air Days. Spare the Air information can be found at www.sparetheair.com.

The Incident Commander (IC) is responsible for determining if the burn will take place.

COMPLIANCE GUIDE TO CONDUCTING LIVE FIRE SAFETY TRAINING BURNS

2. PRESCRIPTION FOR FUEL MOISTURE, WEATHER, AND SOILS:

		<u>Low</u>	<u>High</u>
a.	Relative Humidity (%):	25	70
b.	Air Temperature (Dry Bulb °F):	50	95
c.	Wind Direction:	Any but northerly gradient winds	
d.	Wind Speed (mph):	0	10
e.	Fuel Moisture -		
	1 Hr (%):	4	11
	10 Hr (%):	5	12
	100 Hr (%):	6	13
	1000 Hr (%):	7	14
	Herb Fuel Moisture:	NA	
	Live Woody Fuel Moisture:	NA	
f.	Soil Moisture:	NA	
g.	Duff Moisture:	NA	
h.	Precipitation and Days Since Rain:	None Required	

* The lower limits of parameters, meaning those that contribute to less severe fire behavior, may be exceeded if conditions permit.

3. BEHAVIOR PREDICTIONS:

FUEL MODEL 1

		<u>Low</u>	<u>High</u>
a.	Fire Line Intensity (btu/ft/sec):	1	607
b.	Rate of Spread (ch/hr)		
	Head:	1.4	345
	Backing:	1.4	8.7
c.	Flame Length (ft.)	0.4	8.6
d.	Scorch Height: (ft.)	NA	NA
e.	Probability of Ignition (%):	24	79
f.	Burnout Time (Hrs.)	Target: 4 Hours,	Acceptable: 8 Hours

COMPLIANCE GUIDE TO CONDUCTING LIVE FIRE SAFETY TRAINING BURNS

GO-NO GO CHECKLIST

PROJECT NAME _____ PROJECT INCIDENT NUMBER _____

YES NO

1. Current conditions are within minimum/maximum prescription criteria
TIME _____ TEMP _____ R.H. _____ WIND DIRECTION _____
FUEL STICK _____ LIVE FUEL _____ WIND SPEED _____

2. Spot forecast(s) have been received and reviewed. No adverse weather
Conditions or changes are expected.

3. Applicable permits have been issued and the project complies with all
Requirements of the permits.

4. Personnel and equipment required in the IAP are in position.

5. All personnel have been briefed on the IAP

6. Backup and support resources are available in strength needed to contain
escapes within the burning period.

7. Notifications have been made
 Adjacent Landowners
 News Media
 CAL FIRE Unit ECC
 Lookouts & Air Attack Bases (summer only)
 APCD
 Other: _____

8. Is a test burn required? If yes, go to #9. If no, got to #10.

9. A test plot has been burned satisfactorily.

10. Has any "No" box been checked (other than #8)? If so, do not burn unless
approval to modify the plan has been received.

BEGIN PRESCRIBED FIRE SAFETY TRAINING EXERCISE!

11. Can the plan be modified or action taken to rectify the situation?

STOP IF "NO", DO NOT BURN!

Describe plan change or action to be taken: _____

Obtain approval for changes from the IC (or CAL FIRE Unit Chief if their
jurisdiction). Method of contact Radio Phone Personal Contact

IC Name _____ Date _____

IC Signature _____ Time _____

***** See next page for Spot Weather sources**

SPOT WEATHER FORECAST SOURCES

The following items are available sources for you to obtain spot weather information.

- National Weather Service; www.nws.noaa.gov
- The Weather Channel; www.weather.com
- National Oceanic and Atmospheric Administration (NOAA); www.noaa.org
- The Northern California Geographic Wildfire Coordination Center (ONCC) <http://gacc.nifc.gov/oncc/>

The ONCC site requires a twenty-four hour notice for the location and ignition time for a forecast. This site will give you specific local weather forecasts. Complete the form and submit as requested.

The information sites listed above are also very useful for planning a structure live fire safety training exercise.

[Keep Informed on Fire Weather Conditions and Forecasts](#)

III. STRUCTURE LIVE FIRE SAFETY TRAINING

The procurement of a structure slated for demolition by live fire safety training is the greatest experience and opportunity for fire service personnel. The tasks involved for assuring safety, objective training and regulatory compliances can be overwhelming. This section of the guide will assist the jurisdictional agency in establishing a methodical approach to a safe and productive training experience.

THE BURNING EXPERIENCE

The burning of a building, while exciting, is not the true value of a controlled burn. The true learning experience encompasses all aspects of a structural fire response including all operational criteria.

Size-up and report of conditions, establishing a water supply, assuming or passing command, initial attack, forcible entry, rescue, ventilation, laddering, securing utilities, salvage operations, multiple company and multi-agency operations are all items for consideration in your plan.

Modern firefighting training facilities with pre-plumbed natural gas and smoke generators provide a safe and controlled opportunity for live firefighting practices. Utilizing old or discarded furniture is a sure way to develop attack skills and realistic fire behavior for contents fires. Remember contents fires are the fires we experience the most in residential units.

Practice all aspects of fire fighting within your scope and capabilities.

NFPA 1403; The tactical operations of conducting a live fire safety training exercise are presented in other venues, such as the National Fire Protection Agency - 1403 "Standard On Live Fire Training Evolutions, 2002 Edition", (www.nfpa.org/catalog/product) and Office of State Fire Marshal FSTEP Fire Control-3 "Course Guide for Structural Fire Fighting".

Keep in mind that a qualified Fire Control-3 Senior Instructor certified through the Office of State Fire Marshal's (OSFM) could assist you with the entire project for added safety and success. The OSFM list of Fire Control-3 Senior Instructors can be found at ...

<http://www.fire.ca.gov/firemarshal/sfmtraining/traininginstructors.asp>

Command and Control

At a minimum... refer to NFPA 1403 “Standard On Live Fire Training Evolutions”, utilize the Incident Command System, follow the 2-in and 2-out rule, establish a Rapid Intervention Team and practice the Fireground Emergency Distress Signal protocol.

OBTAINING A STRUCTURE

Is the building(s) structurally sound (**of training quality**) and applicable to controlled burning, YES or NO? If No... then do not obligate your agency into conducting a demolition operation in order to save the homeowner/responsible party possible demolition costs. The fire agency can be fined for such activities. In other words, the fire service cannot burn a vehicle or structure just for the sake of burning. Tangible training objectives must be predetermined and obtained from the burning activity. An Incident Action Plan (IAP) can also serve as **proof of quality training**.

STRUCTURE QUALITY CRITERIA:

- A. Will there be sufficient structural integrity and quality after abatement of the Asbestos Containing Materials?
- B. Is the intended structure less than 50 years old? (Contact the local Historical Society for clearance if greater than 50 years old)
- C. Are the exterior doors and windows intact? If NOT, is there a means to cover the openings?
- D. Does roof stability allow performance of vertical ventilation?
- E. Are the floors (wood) intact as to allow for search and rescue practices?
- F. Have the utilities been secured and removed?
- G. Can the building(s) be secured after each day’s activities or exercise?

If the answer is **YES** to all of these items – the building is definitely suitable for a quality live fire training exercise.

THINK SAFETY!

SITE PREPARATION

In preparing the facility or area for your training exercise, you must conduct a walk-around. Consider the removal or flagging of any potential hazardous areas. Water heaters (gas or electric) are an explosion hazard and need to be removed or punctured. Some of these units may also contain asbestos materials. Removal of thermostats or any other equipment containing mercury is required. Always check the floors for areas where materials have been removed or damaged and where nails or fasteners may be exposed. Secure coverings over any open septic or sewer inlets within the structure (methane gas may be present).

The property owner and/or responsible party should assure that all life threatening hazards, potential hazards, or susceptible properties are flagged and communicated to you during your property review. These hazards need to be secured prior to the implementation of any training activities/exercise.

EXAMPLES:

Hazards defined may include, **BUT NOT LIMITED TO**, any of the following;

- A. Septic Tanks, Cesspools, Leach lines
- B. Public Utilities
- C. Propane Tanks, Natural Gas Lines
- D. Wells, External Plumbing
- E. Mines/Shafts
- F. Trees or Bushes
- G. Retaining Walls or Drop Offs
- H. Structural Integrity
- I. Hazardous Materials, such as petroleum products (oil, paints, and thinners), poison, pesticides, and **stored explosives**
- J. Check the attic space for the type of insulation material, i.e., is it fiberglass or cellulose?
 - For Arson Task Force training, check and recheck for attic extension.

EXAMPLES (Continued):

- K. Any item containing chlorofluorocarbon (CFC) such as refrigerators, freezers, window mount A/C units, HVAC system (roof or ground mounted) **MUST BE** removed prior to any burning.
- Planned burning involving a HVAC unit constitutes the intentional release of CFC's. As an environmental danger, it is subject to US-EPA enforcement action.
 - If possible have the HVAC unit removed, or at a minimum, have the materials drained by an authorized HVAC contractor.
 - Check the stability of the roof or attic for the potential of collapse onto unsuspecting firefighters due to the removal process of a HVAC unit.
- L. Nearby Exposures
- Neighboring houses with wood shake roof coverings, patio furniture, porch canopies, oak trees (a fine can be expected for damaging or destroying an oak tree with a trunk size greater than six inches), hay bale stacks, palm trees, other trees and vegetation, and out buildings are just a few big examples.
- M. Establish a safety plan, LCES, for handling the residual hazards, such as twisted metal, nails, hot ash, weakened tree limbs and smoldering debris.
- N. Ensure that weather conditions are appropriate for a positive training experience. Note wind conditions, smoke dispersal, and firefighter fatigue potential (heat or cold).
- O. Be certain that there is a clear understanding of the expectations between the owner(s) and the host fire agency regarding the demolition, supervision, financial, logistics, and waste disposal/clean-up obligations of the training site.
- Clarify the changeover of responsibility timeframes for post training monitoring and patrol.
- P. Refer to the *STRUCTURE BURN CHECK LIST* for assistance.

Remember-Safety of personnel is foremost during any training exercise.

COMPLIANCE GUIDE TO CONDUCTING LIVE FIRE SAFETY TRAINING BURNS

STRUCTURE BURN CHECK LIST

Project Name:_____ Date:_____

Location:_____

Contact Person(s):_____ Numbers:_____

Project Description:_____

Check List

<u>Item:</u>	<u>Responsible:</u>	<u>Date:</u>
1. [] Determine Training Value	Fire Agency	_____
2. [] Live Fire Training Plan Packet to Owner	Fire Agency	_____
3. [] Proof of Cancellation of Fire Insurance	Owner	_____
4. [] Historical Society (>50 years old)	Owner	_____
5. [] Copy of Deed-No Lien Holders	Owner	_____
6. [] District "Release of Liability" Letter	Owner	_____
7. [] Demolition Permit	Owner	_____
8. [] Removal of Asbestos Containing Materials (ACMS) <i>Asbestos Survey Report</i>	Owner	_____
9. [] Air Pollution Control District Burn Permit	Fire Agency	_____
10.[] Schedule with State Fire Marshal (FSTEP)	Fire Agency	_____
11.[] Federal EPA-NESHAP Notification	Fire Agency	_____
12.[] State Air Resources Board Notification	Fire Agency	_____
13.[] Utilities Secured	Owner	_____
14.[] Notification to Water Department	Fire Agency	_____
15.[] Incident Action Plan (Safety Plan)	Fire Agency	_____
16.[] Notification to Neighbors	Fire Agency	_____
17.[] Notification to Law Enforcement	Fire Agency	_____
18.[] Portable Toilets	Owner	_____
19.[] Logistics (Lunch, Drinks)	Owner	_____
20.[] Safety of Scene During Operations	Fire Agency	_____
21.[] Security of Scene After Burning, Clean Up	Owner	_____
22.[] Follow-Up Call to the Owner	Fire Agency	_____

IV. PERMIT PROCESS

Each live fire safety training venue requires various permits and notifications. Failure to obtain the proper permits and to make timely notifications can be problematic for all parties involved, including the loss of privileges to conduct live fire safety trainings, discontented relations with your constituents, embarrassment for your agency, and possible enforcement actions compounded by fines.

Please refer to Attachment III: PERMIT/NOTIFICATION QUICK REFERENCE MATRIX for a quick guide of the needed permits and notifications for the respective type of live fire safety training burn to be conducted.

NOTES:

1. A sample release of liability form is Attachment IV. This form or one like it must be in the possession of the Fire Agency before the training.
2. It should be determined that insurance coverage from fire loss has been discontinued / removed.
3. All utilities must be secured or removed by the jurisdictional utility company.
4. All ACMs are identified and removed by a CAL-OSHA certified asbestos removal contractor (Obtain the letter, or report on the removal, from the contractor for use in the notification requirements).
5. Building departments (Municipal or County) issue Demolition permits to property owners or general contractors **ONLY** – not to Fire Agencies.
6. Local Historical Society requires notification if house is greater than 50 years old.
7. Placer County APCD issues a fire training burn permit **ONLY** to the Fire Agency conducting the training.
8. Permits are subject to all applicable permit / inspection fees.

V. NOTIFICATION REQUIREMENTS

FEDERAL:

Federal law requires you to notify the following agencies of the date and time for the controlled burning of any building. The live fire training is considered demolition. These notifications must be done utilizing the "Notification of Demolition and Renovation form" (provided at Attachment I or on-line at <http://www.arb.ca.gov/enf/asbestos/asbestosform.htm>). An example of the notification is provided. Mail one copy to each of the agencies below (Faxing or e-mail is not acceptable).

The California Air Resources Board prefers a faxed copy with the asbestos report. Their fax number is listed below. (E-mail is not acceptable). The notification is required ten (10) working days prior to the controlled burn.

Send original by mail to:

U.S. EPA - Region IX
Attn: Robert Trotter
Asbestos NESHAP Notification (Air 5)
75 Hawthorne Street
San Francisco, CA 94105
Phone: (415) 972-3989

And a copy faxed or mailed to:

California Air Resources Board
Enforcement Division
Asbestos NESHAP Notification
P.O. Box 2815
Sacramento, CA 95812
Phone: (916) 322-6036
Fax: (916) 445-7986

For more information regarding NESHAP, visit...
<http://www.epa.gov/region04/air/asbestos/asbqa.htm>

LOCAL:

Notification to the Placer County APCD is made by the fire agency responsible for the training up to 24 hours prior to the live fire safety training exercise at the following address:

Placer County Air Pollution Control District (APCD)
3091 County Center Drive, Suite 240
Auburn, California 95603
Phone (530) 745-2330

This notification provides the APCD with information regarding the controlled burn in order to respond to any complaints received. Messages can be left on the APCD voice mail but should be done during normal business hours.

NEIGHBORHOOD NOTIFICATIONS

It is strongly recommended that all neighboring properties be notified of the controlled burn. A sample notification form is provided for this purpose (Attachment II: NOTICE TO NEIGHBORING PROPERTIES). Providing notification can reduce negative concerns associated with such training and allows persons with health concerns to take appropriate precautions. It also allows persons who may want to observe. Notification should take place at least one week prior to the training. Not providing notification shows a lack of concern and respect to those potentially affected, and may jeopardize future live fire safety training exercises in your neighborhood.

Fire Department Training in Progress signs should be posted in the immediate area of the exercise to minimize false-alarm reports of a fire or confusing an actual fire in the area with the training exercise.

In summary, the fire agency with jurisdictional authority is responsible for notifying all parties affected, and shall confirm all required permits are obtained. See Attachment III: **PERMIT/NOTIFICATION QUICK REFERENCE MATRIX** for a quick reference on required permits and notifications.

COMPLIANCE GUIDE TO CONDUCTING LIVE FIRE SAFETY TRAINING BURNS

ASBESTOS NESHAP NOTIFICATION OF DEMOLITION AND RENOVATION (Example Form)

OPERATOR PROJECT #	POSTMARK	DATE RECEIVED	NOTIFICATION #		
I. TYPE OF NOTIFICATION (O - ORIGINAL C- CANCELLED) (R - REVISION -- WRITE REVISION #?) O - Original					
II. FACILITY INFORMATION (IDENTIFY OWNER, REMOVAL CONTRACTOR, AND OTHER OPERATOR)					
OWNER NAME: Put Owner's name					
ADDRESS: Their mailing address					
CITY: Their city	County: Placer	State: CA	ZIP: XXXXX		
CONTACT: Owner is the contact			Telephone: (XXX) XXX-XXXX		
ASBESTOS REMOVAL CONTRACTOR: If known - with their address info					
ADDRESS:					
CITY:		State:	Zip:		
CONTACT:		Telephone:	Title:		
DEMOLITION CONTRACTOR: Fire District					
ADDRESS: Fire District mailing address					
CITY: City		State: CA	ZIP: XXXXX		
CONTACT: Fire District Contact		Telephone: (XXX) XXX-XXXXX	Title: Their Title		
III. TYPE OF OPERATION: (D-DEMO O-ORDERED DEMO R-RENOVATION E-EMERGENCY RENOVATION): D					
IV. IS ASBESTOS PRESENT? (YES / NO) NO		List Type of Asbestos Material (s) to be Removed:			
V. FACILITY DESCRIPTION (INCLUDE BUILDING NAME, NUMBER AND FLOOR OR ROOM NUMBER)					
BUDG NAME: Residential with address info					
ADDRESS: Building Location					
CITY: Building Location		County: Where Located	State: CA ZIP: XXXXX		
SITE LOCATION:					
BUILDING SIZE:		Number of floors:	Age in years:		
PRESENT USE:		PRIOR USE:			
VI. PROCEDURE, INCLUDING ANALYTICAL METHOD, IF APPROPRIATE, USED TO DETECT THE PRESENCE OF ASBESTOS MATERIAL: PLM					
VII. APPROXIMATE AMOUNT OF ASBESTOS, INCLUDING: 1. REGULATED ACM TO BE REMOVED 2. CATEGORY I ACM NOT REMOVED 3. CATEGORY II ACM NOT REMOVED	RACM TO BE REMOVED	NONFRIABLE ASBESTOS MATERIAL TO BE REMOVED		NONFRIABLE ASBESTOS MATERIAL NOT TO BE BEREMOVED	
		CAT I	CAT II	CAT I	CAT II
PIPES: (Linear Feet)					
SURFACE AREA (Square Feet)					
VOL. RACM OFF FACILITY COMPONENT (Cubic Feet)					
VIII. SCHEDULED DATES DEMO/RENOVATION (MM/DD/YY) Start: Date of Fire Training Complete: Date Ends					
IX. SCHEDULED DATES ASBESTOS REMOVAL (MM/DD/YY) Start: Complete: Weekdays Work Hours: Weekend Work Hours:					

COMPLIANCE GUIDE TO CONDUCTING LIVE FIRE SAFETY TRAINING BURNS

x. DESCRIPTION OF PLANNED DEMOLITION OR RENOVATION WORK, AND METHOD(S) TO BE USED:		
1) Planned Training Burn – Room Fires (Or what the training will be).		
2) Total Demolition To The Ground By Fire.		
XI. DESCRIPTION OF WORK PRACTICES AND ENGINEERING CONTROLS TO BE USED TO PREVENT EMISSIONS OF ASBESTOS AT THE DEMOLITION AND RENOVATION SITE.		
XII. WASTE TRANSPORTER #1		
ADDRESS:		
CITY:	STATE	ZIP
CONTACT PERSON:	TELEPHONE:	
XIII. WASTE DISPOSAL SITE:		
NAME:		
LOCATION:		
CITY:	STATE	ZIP
TELEPHONE:		
XIV. IF DEMOLITION ORDERED BY A GOVERNMENT AGENCY, PLEASE IDENTIFY THE AGENCY BELOW:		
NAME:	TITLE:	
AUTHORITY:		
DATE OF ORDER (MM/DD/YY)	DATE ORDERED TO BEGIN: (MM/DD/YY)	
XV. FOR EMERGENCY RENOVATIONS:		
a) DATE AND HOUR OF EMERGENCY: (MM/DD/YY)		
b) DESCRIPTION OF THE SUDDEN, UNEXPECTED EVENT:		
c) EXPLANATION OF HOW THE EVENT CAUSED UNSAFE CONDITIONS OR WOULD CAUSE EQUIPMENT DAMAGE OR AN UNREASONABLE FINANCIAL BURDEN:		
XVI. DESCRIPTION OF PROCEDURES TO BE FOLLOWED IN THE EVENT THAT UNEXPECTED ASBESTOS IS FOUND OR PREVIOUSLY NONFRIABLE ASBESTOS MATERIAL BECOMES CRUMBLLED, PULVERIZED, OR REDUCED TO POWDER.		
XVII. I CERTIFY THAT AN INDIVIDUAL TRAINED IN THE PROVISIONS OF THIS REGULATION (40 CFR PART 61, SUBPART M) WILL BE ON-SITE DURING THE DEMOLITION OR RENOVATION AND EVIDENCE THAT THE REQUIRED TRAINING HAS BEEN ACCOMPLISHED BY THIS PERSON WILL BE AVAILABLE FOR INSPECTION DURING NORMAL BUSINESS HOURS (REQUIRED 1 YEAR AFTER PROMULGATION)		
_____		_____
(SIGNATURE OF OWNER/OPERATOR)		(DATE)
XVIII. I CERTIFY THAT THE ABOVE INFORMATION IS CORRECT.		
_____		_____
(SIGNATURE OF OWNER/OPERATOR)		(DATE)

INSTRUCTIONS

- I. Type of Notification: Enter "O" if the notification is a first time or original notification, "R" if the notification is a revision of a prior notification, or "C" if the activity has been cancelled.
- II. Facility Information: Enter the names, addresses, contact persons and telephone numbers of the following:
Owner: Legal owner of the site at which asbestos is being removed or demolition planned.
Removal Contractor: Contractor hired to remove asbestos.
Other Operator: Demolition contractor, general contractor, or any other person who leases, operates, controls or supervises the site.
If known, the name of the site supervisor should be entered as the contact person for the notification. If additional parties share responsibility for this site, demolition activity, renovations or ACM removal, include complete information (including name, address, contact person and telephone number) on additional sheets submitted with the form.
- III. Type of Operation: Enter "D" for facility demolition, "R" for facility renovation, "O" for ordered demolitions, or "E" for emergency renovations.
- IV. Is Asbestos Present? Answer "Yes" or "No" regardless of the amount or type of asbestos.
- V. Facility Description: Provide detailed information on the areas being renovated or demolished. If applicable, provide the floor numbers and room numbers where renovations are to be conducted.
Site Location: Provide information needed to locate site in the event that the address alone is inadequate.
Building Size: Provide in square meters or square feet.
No. of Floors: Enter the number of floor including basement or ground level floors.
Age in Years: Enter approximate age of the facility.
Present Use/Prior Use: Describe the primary use of the facility or enter the following codes: H - Hospital; S - School; P - Public Building; O - Office; I - Industrial; U - University or College; B - Ship; C - Commercial; or R - Residence.
- VI. Asbestos Detection Procedure: Describe methods and procedures used to determine whether ACM is present at the site, including a description of the analytical methods employed.
- VII. Approximate Amount of Asbestos Including: (1) Regulated ACM to be removed (including nonfriable ACM to be sanded, ground or abraded); (2) Category 1 ACM not removed; and (3) Category II ACM not removed.
For both removals and demolitions, enter the amount of RACM to be removed by entering a number in the appropriate box and an "X" for the unit. For demolitions only, enter the amount of Category I and II nonfriable asbestos not to be removed in the appropriate boxes.
Category I nonfriable material includes packing, gaskets, resilient floor covering and asphalt roofing materials containing more than one percent asbestos. Category II nonfriable material includes any material, excluding Category I products, containing more than one percent asbestos, that when dry, cannot be crumbled, pulverized or reduced to powder.
- VIII. Scheduled Dates of Asbestos Removal (MM/DD/YY): Enter scheduled dates (month/day/year) for asbestos removal work. Asbestos removal work includes any activity, including site

COMPLIANCE GUIDE TO CONDUCTING LIVE FIRE SAFETY TRAINING BURNS

Instructions Continued:

- preparation, which may break up, dislodge or disturb asbestos material.
- IX. Scheduled Dates of Demo/Renovation (MM/DD/YY): Enter scheduled dates (month/day/year) for beginning and ending the planned demolition or renovation.
- X. Demolition of Planned Demolition or Renovation Work, and Method(s) to be Used: Include in this description the demolition and renovation techniques to be used and a description of the areas and types of facility components which will be affected by this work.
- XI. Description of Engineering Controls and Work Practices to be Used to Control Emissions of Asbestos at the Demolition and Renovation Site: Describe the work practices and engineering controls selected to ensure compliance with the requirements of the regulations, including both asbestos removal and waste-handling emission control procedures.
- XII. Waste Transporter(s): Enter the names, addresses, contact persons and telephone numbers of the persons or companies responsible for transporting ACM from the removal site to the waste disposal site. If the removal contractor or owner is the waste transporter, state "same as owner" or "same as removal contractor." If additional parties are responsible, include complete information on an additional sheet submitted with the form.
- XIII. Waste Disposal Site: Identify the waste disposal site, including the complete name, location and telephone number of the facility. If ACM is to be disposed of at more than one site, provide complete information on an additional sheet submitted with the form.
- XIV. If Demolition is Ordered by a Government Agency, Please Identify the Agency below: Provide the name of the responsible official, title and agency, authority under which the order was issued, the dates of the order and the dates of the ordered demolition.
- XV. Emergency Renovation Information: Provide the date and time of the emergency, a description of the event and a description of unsafe conditions, equipment damage or financial burden resulting from the event. The information should be detailed enough to evaluate whether a renovation falls within the emergency exception.
- XVI. Description of Procedures to be Followed in the Event that Unexpected Asbestos is Found or Previously Nonfriable Asbestos Material Becomes Crumbled, Pulverized or Reduced to Power: Provide adequate information to demonstrate that appropriate actions have been considered and can be implemented to control asbestos emissions adequately, including at a minimum, conformance with applicable work practice standards.
- XVII. Certification of Presence of Trained Supervisor: One year after promulgation of the applicable regulation, the notifier must certify that a person trained in asbestos-removal procedures will supervise the demolition or renovation. The supervisor is responsible for the activity on-site. Evidence that the training has been completed by the supervisor must be available for inspection during normal business hours.
- XVIII. Verification: Please certify the accuracy and completeness of the information provided by signing and dating the notification form.

NOTICE TO NEIGHBORING PROPERTIES

This is to inform you, that your fire department will be conducting a live fire safety training exercise(s);

Vehicle Vegetation Structural

on the property located at:

The date(s) for the training are _____,

from the hours of _____ to _____.

This type of training is essential to providing this community with well-trained firefighters. The exercise will allow our personnel a chance to enhance their skills in suppression activities and to work safely in a controlled environment for future fire and life safety needs.

Please note that smoke and flame may be visible from time to time. All precautions have been taken for the safety of surrounding properties.

We sincerely hope this training opportunity does not cause any disruption of your normal activities.

Thank you, for your indulgence and cooperation.

For further information contact _____
Live Fire Safety Training Exercise Coordinator

Office:(_____) _____

**PERMIT/NOTIFICATION
QUICK REFERENCE MATRIX**

Type of Training Burn			Sets Only in a Structure (Fire Investigation)	
Permit and Notification Requirements	Vehicle	Vegetation		Structure
U.S. EPA	NESHAP applies the same as Structure notification	No Requirements	No Requirements	NESHAP Applies, Fire Agency Notification 10 working days before burn plus obtain copy of Asbestos Report from Owner
California Air Resources Board	NESHAP applies the same as Structure notification	No Requirements	No Requirements	NESHAP Applies, Fire Agency Notification 10 working days before burn plus obtain copy of Asbestos Report from Owner
Placer County Air Pollution Control District	Fire Agency Obtain Burn Permit	Fire Agency Obtain Burn Permit	Fire Agency Obtain Burn Permit	Fire Agency Obtain Burn Permit with copy of Asbestos Report from Owner
Local Building Department	No Requirements	No Requirements	No Requirements	Owner obtain Demolition Permit
Local Historical Society/Planning Department	No Requirements	No Requirements	No Requirements	Owner contacts Society/Department, if building is over 50 Years old, a determination of historical significance is required
CAL FIRE	Notification to the CAL FIRE Administrative Unit if in the SRA	Notification to the CAL FIRE Administrative Unit if in the SRA	Notification to the CAL FIRE Administrative Unit if in the SRA	Notification to the CAL FIRE Administrative if in the SRA, FSTEP if you want to issue Fire Control 3 certificates, Requires 6 weeks notice
Community or Neighborhood	Door to door, or telephone affected neighbors	Letters of Notification should be sent to all affected areas and the media	Door to door, or telephone affected neighbors	Letters of Notification should be sent to all affected area homes and businesses, including the media
Local Water Agency	No Requirements	No Requirements	No Requirements	Possible permit required, depending on the estimated total gallons to be used

LIABILITY RELEASE FORM

DATE: _____

TO: _____ **Fire Protection District / Department**

FROM: _____

SUBJECT: PLANNED LIVE FIRE SAFETY TRAINING EXERCISE

This is to certify that the undersigned is the owner and / or legal occupant and possessor of real property commonly described as;

and the undersigned has the full authority to authorize the _____ Fire Protection District / Department to demolition the above described property by controlled burning.

The undersigned hereby authorizes the _____ Fire Protection District / Department to burn the above property. That the undersigned hereby covenants, declares, warrants and represents the following:

- * That there is no insurance obligation that can be violated; and
- * That there are no liens on the property; and
- * That there are no legal obligations that can be violated by said burning; and
- * That the undersigned has public liability and property damage insurance covering the claims of third persons for injuries and / or property damage proximately caused by said burning.

LIABILITY RELEASE FORM (Continued):

The undersigned hereby releases the _____ Fire Protection District / Department of any claim of liability that the undersigned may have in connection with the said burning, and acknowledges that such burning and all activities connected therein is performed on order of the undersigned and the undersigned agrees to be responsible therefore.

In consideration of this agreement, the undersigned does hereby covenant and agree to indemnify and hold harmless the _____ Fire Protection District / Department from any and all claims of the undersigned. Furthermore, I indemnify them or any other person or persons whomsoever for personal injuries and / or property damage arising out of or incidental to said burning inside, upon, or outside of said premises.

The undersigned agree that the _____ Fire Protection District / Department will not be held responsible for any materials removed from the premises nor will the Fire Protection District / Department be responsible for any clean up or damage to any plant, animal, human, environment, or other properties.

The undersigned further states that all public utilities and other agencies that have property in the area described above have been notified of the burning and have had the opportunity of having their property removed.

SIGNED: _____ **DATE:** _____

WITNESSED: _____ **DATE:** _____
(Fire District / Department Representative)

OSHA CONSULTANT LIST

The Division of Occupational Safety and Health (DOSH) has a list of individuals who are certified as Asbestos Consultants or Site Surveillance Technicians. If you suspect Asbestos Containing Materials (ACMs) in your structure slated for live fire safety training, then you are required by law to hire a DOSH approved qualified technician for the inspection and removal of ACMS greater than 100 square feet.

See NESHAP requirements at <http://www.epa.gov/asbestos/neshap.htm> for more information.

The DOSH list of consultants and technicians is a reference only to the available contractors.

1. To find a contractor in your area, visit web site

http://www.dir.ca.gov/databases/doshcaccsst/caccsst_Query_1.HTML

2. Scroll to the bottom of the page to find query field “Top of Form”

The image shows a search form with three input fields: "Last Name:", "Employer:", and "City:". To the right of the "City:" field are two buttons: "Search" and "Clear". Below these buttons is a button labeled "View Entire Listing". Two arrows originate from the bottom left of the page, pointing to the "City:" input field and the "Search" button.

3. Type in the **City**, then click on **Search** for a list of contractors in your area.



Winston H. Hickox
Agency Secretary

Air Resources Board

Alan C. Lloyd, Ph.D.
Chairman

1001 I Street • P.O. Box 2815 • Sacramento, California 95812 • www.arb.ca.gov



Gray Davis
Governor

MEMORANDUM

TO: California Fire Chiefs

FROM: United States Environmental Protection Agency (EPA)
California Air Resources Board (CARB)

DATE: June 21, 2001

SUBJECT: Fire Department Training Burns

In 1990 and 1994 the Environmental Protection Agency revised asbestos regulations that have an effect on fire department training burns. The regulations are the Asbestos National Emissions Standards for Hazardous Air Pollutants (NESHAP) and the Model Accreditation Plan (MAP).

The NESHAP requires that all regulated asbestos containing material be removed from facilities intentionally burned for training purposes by fire departments. This requirement includes the removal of such asbestos containing material as floor tiles and asphaltic roofing. These asbestos removal requirements apply to all structures including single family residences utilized by a fire department in a training burn. In addition, the NESHAP requires that EPA, CARB or delegated local Air Pollution Control Districts be notified of the training ten working days prior to the burn.

Some fire departments are submitting notifications stating an asbestos survey was conducted by a "visual determination". The NESHAP requires that a thorough inspection for asbestos be conducted prior to the demolition of a structure under 40 CFR Section 61.145. A "visual determination" does not meet this requirement.

In addition to NESHAP requirements, EPA's MAP requires that only certified Asbestos Hazard Emergency Response Act (AHERA) Inspectors can conduct surveys and sample suspect asbestos containing material. MAP requirements are mandated under Section 15 (a)(3) of the Asbestos School Hazard Abatement Reauthorization Act (ASHARA). The AHERA certification requirements pertain to all public and commercial buildings, including those structures used by fire departments for training burns. Requirements for the AHERA Building Inspectors Course can be found in 40 CFR part 763. The Federal Occupational Safety and Health Administration regulation also require AHERA certified individuals to conduct asbestos inspections.

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Website: <http://www.arb.ca.gov>.

California Environmental Protection Agency

Printed on Recycled Paper

COMPLIANCE GUIDE TO CONDUCTING LIVE FIRE SAFETY TRAINING BURNS

California Fire Chiefs
June 21, 2001
Page 2

The California Occupational Safety and Health Administration (CAL/OSHA) regulation requires asbestos surveys to be conducted by individuals who are AHERA certified and registered as Certified Asbestos Consultant (CAC) or Site Surveillance Technician (SST) in California.

Violation of NESHAP and AHERA regulations can result in fines of up to \$25,000 per day per violation or criminal prosecution.

EPA and CARB will distribute follow-up materials to your training officers to assist your department in complying with asbestos regulations. Compliance with these rules will reduce exposure to your personnel as well as reduce risk to the general population. If you have any questions on asbestos removal regulations and fire departments, please feel free to contact Ahmad Najjar of CARB at (916)322-6036 or Robert Trotter of US EPA at (415)744-1145.

ACKNOWLEDGEMENTS

This page is dedicated to those whom have contributed collectively over the years since the inception of the first draft in 1992. The contributions presented in this document are compiled from years of accumulated experience and through established cooperative working relationships with enforcement agencies.

In Recognition...

Timothy Mrozinski, Fire Chief (Retired), Rocklin Fire Department

Ann Hobbs, Air Quality Specialist, Placer County Air Pollution Control District

Tony Roberts, Battalion Chief, California Department of Forestry and Fire Protection

Robert Trotter, Asbestos NESHAP Coordinator, United States Environmental Protection Agency Region 9

Ahmed “AJ” Najjar, Air Pollution Specialist, California Air Resources Board

John Shelton, Battalion Chief, Rocklin Fire, President - Placer County Training Officers Association

Safety and Compliance