



U.S. Environmental Protection Agency Applicability Determination Index

Control Number: A960031

Category: Asbestos
EPA Office: SSCD
Date: 04/19/1994
Title: Practice Fire Burns
Recipient: Thompson, Tommy
Author: Ripp, Tom

Subparts: Part 61, M, Asbestos

Abstract:

Q. Would EPA waive the requirements of the asbestos NESHAP in instances where buildings are being used for practice fire burns?

A. No. EPA considers it necessary to regulate demolition by burning because the exposure of the building materials to the heat generated by the fire increases the potential for significant fiber release.

Letter:

Honorable Tommy G. Thompson
Governor of Wisconsin
Room 115 East, State Capitol
P.O. Box 7863
Madison, Wisconsin 53707

Dear Governor Thompson:

This is in response to your letter dated March 22, 1994, requesting that the Environmental Protection Agency (EPA) consider waiving the requirements of the asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP) in instances where buildings are being used for practice fire burns.

This issue was brought to our attention by the North Carolina State Fireman's Association and the North Carolina State Fire and Rescue Commission. Both expressed concern for EPA's position governing residential dwellings which are used for live fire training exercises. In our responses to the two groups we stated our position and clarified the requirements of the asbestos NESHAP (Enclosures I and II).

EPA considers regulating demolition by burning necessary because of the potential fiber release. Typical residential asbestos building materials (friable and nonfriable) are made friable during burning since the heat generated during a fire destroys the matrix which holds the fibers together, but does not destroy the asbestos fibers. A conventional demolition, for example would not cause problems with roofing materials and floor tile that is not friable before demolition, but would definitely create a great potential for significant fiber release if the building were demolished by burning.

In our June 11, 1992 response to the North Carolina State Fireman's Association (Enclosure II), we clarified the requirements for performing an inspection, notification of demolition, and if asbestos were found, the removal requirements. While our policy under the NESHAP remains the same, some information contained in the June 11 letter has changed. Vista Computer Services is EPA's new contractor that maintains a current listing of accredited training providers and courses throughout the United States. This information can be obtained by calling the National Directory of AHERA Accredited Courses at 1-800-462-6706. Additionally, EPA has published an interim final rule (Asbestos Model Accreditation Plan, 59 FR 5236-5260 February 3, 1994) that requires anyone performing an "inspection" for asbestos in a school, public or commercial building to be accredited under the Model Accreditation Plan. This accreditation can be obtained by taking the 3-course Building Inspectors Course that was previously a recommended course.

If you have any questions, please call me at (703) 308-8727

Sincerely,

Tom Ripp, Chemical Engineer
Stationary Source Compliance Division
Office of Air Quality Planning and Standards

Enclosures

cc: Dave Kee, Region V USEPA