



## U.S. Environmental Protection Agency Applicability Determination Index

**Control Number: A930004**

**Category:** Asbestos  
**EPA Office:** SSCD  
**Date:** 06/11/1992  
**Title:** Residential Dwellings for Fire Training  
**Recipient:** Miller, Paul F.  
**Author:** Rasnic, John B.

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**Subparts:** Part 61, M, Asbestos

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**References:** 61.140  
61.141  
61.142  
61.143  
61.144  
61.145  
61.146  
61.147  
61.148  
61.149  
61.150  
61.151  
61.152  
61.153  
61.154  
61.155  
61.156  
61.157

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**Abstract:**

The requirements of the asbestos NESHAP (40 CFR Sections 61.140 through 61.157) as it applies to buildings to be burned by fire departments for training purposes. Three specific questions are addressed: training for firemen who inspect for their department and the cost of training; the reporting procedure and type of notification required prior to burning and what procedure would be followed if asbestos were/were not found; and requirements for a removal permit for the fire department.

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**Letter:**

Paul F. Miller  
North Carolina State Fireman's Association  
Office of Secretary  
Box 188  
Farmville, NC 27828-0188

Dear Mr. Miller

This letter is in response to your May 22, 1992 letter requesting clarification of the requirements of the asbestos NESHAP (40 CFR Sections 61.140 through 61.157) as it applies to buildings to be burned by fire departments for training purposes. Enclosed are some guidance documents (EPA 340/1-90-015, 016, 018, 019, and 021) that may help you understand the requirements of the asbestos NESHAP. Your specific questions are addressed below. The responses apply only to the Federal requirements of the asbestos NESHAP. The North Carolina State Firemen's Association should check to see if any delegated local agency has more stringent requirements than the Federal Rule.

1. ... what type of training would be required for the fireman who inspect for their department, and what would be the cost of training, if any?

Response: The asbestos NESHAP does not specify any requirements for training the person(s) who thoroughly inspect the affected facility. However, EPA recommends that the person(s) who conduct the inspection of the facility attend and pass the 3-day Building Inspectors Course developed under the Asbestos Hazard Emergency Response Act (AHERA) program. The cost of the training is several hundred dollars. EPA, through its contractor ATLAS Federal Services, Inc. maintains a current listing of accredited training providers and courses throughout the United States. Also, it is possible for you to purchase a copy of the model inspector training materials if you are interested in developing an in-house training capability. For more information, you may call ATLAS at (301) 984- 1929.

2. ... what would be the reporting procedure, and what kind of notification would be required prior to burning? ...what procedure would be followed if asbestos were found, and conversely, if no asbestos were found?

Response: As stated in the letter to Congressman Howard Coble, House of Representatives (enclosed with your May 22 letter), When the amount of ACM in the building is less than the threshold amounts discussed above, the asbestos NESHAP only requires the following: (1) that an inspection of the building be conducted and; (2) that the owner or operator notify EPA or its delegated authority of the demolition at least 10 days in advance of commencing the demolition operation. These requirements are contained in sections 61.145(a) and (b) of the asbestos NESHAP. If the amount of asbestos-containing material (ACM) is greater than the threshold amounts, then the asbestos must be removed in accordance with section 61.145(c) and disposed of in accordance with section 61.150.

3. ... would a removal permit be required for the fire department?

Response: EPA does not require permits to remove asbestos- containing material.

Once again, these responses only address the requirements of the Federal asbestos NESHAP. Delegated agencies may have more stringent requirements. Caroline Robinson (phone # 404-347-5014) is the asbestos NESHAP coordinator for EPA Region IV which includes North Carolina. She should be able to answer further questions on the asbestos NESHAP, and give you contact names for local delegated agencies.

This determination has been coordinated with EPA's Office of Enforcement, the Emission Standards Division of the Office of Air Quality Planning and Standards, and the Office of Pollution Prevention and Toxics. If you have any questions, please contact Tom Ripp of my staff at (703) 308-8727.

Sincerely,

John B. Rasnic, Director  
Stationary Source Compliance Division Office of Air Quality Planning and Standards

Enclosures

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