



April 28, 2011

COMPLIANCE ADVISORY

Notice Regarding Fire Training Exercises

The purpose of this advisory is to communicate The San Diego Air Pollution Control District (District) requirements during fire suppression training (including structural and open burning) and other training activities within structures (commercial and residential buildings, and all other structures) which may disturb asbestos.

Intentional Burning of Structures for Fire Suppression Training

Regulations consider the intentional burning of any structure for fire suppression training a demolition. Rule 361.145 (National Emission Standard for Asbestos) requires a ten-working day advance written notification for all demolitions of regulated structures, even if no asbestos containing material is present. However, prior to any demolition (the intentional burning of any structure), you will need to have the structure surveyed for the presence of asbestos-containing material (ACM). If the survey reveals any material containing greater than 1% asbestos, whether friable or non-friable, it must be removed prior to burning. Any burning of asbestos-containing structures will result in enforcement action against the property owner and those responsible for the burning, for having created a public nuisance. After the fire suppression training is completed, extinguish the fire immediately to minimize air contaminants.

Disturbing Structures for Fire Suppression Training

Other trainings in structures also require an asbestos survey prior to its commencement where any cutting or breaking of floors, walls, ceilings, or roofs may occur. If regulated amounts of ACM are found during the survey, it must be removed in compliance with Rule 361.145. For more information about asbestos, you may contact Gerry Griffin at (858) 586-2660 and/or visit this link: <http://www.sdasbestos.org/>. To view Rule 361.145 (National Emission Standard for Asbestos), use this link: <http://www.sdapcd.org/rules/Appendix/AppenB/SubpM.pdf>

Wild land Burning for Fire Suppression Training

The District regulates other fire suppression training, including the burning of grasses, weeds, and brush (open burning). In order to conduct a fire training exercise of this nature, you must first obtain a burn permit and comply with the requirements of District Rule 101, Burning Control. To obtain a burn permit, call Jimmy Cooksey at (858) 586-2670. To access District Rule 101, use this link: <http://www.sdapcd.org/rules/Reg6pdf/R101.pdf>

You may also call the District's Small Business Assistance Specialist, Eric Luther at (858) 586-2656, to discuss District requirements.

EL:jlmm

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