Burning Down the House: How Can Your Fire Department Do it Properly?

For more realistic training, fire departments sometimes burn structures that are destined to be torn down, such as commercial buildings, residential homes and barns. Situations where these structures are legally burned as part of a supervised fire training exercise are invaluable to fire department personnel. Unfortunately, due to the potential exposure to toxic fumes and hazardous materials, this can adversely affect human health and the environment. This fact sheet details the steps fire departments must take to minimize the potential impact to human health and the environment and ensure compliance with Ohio’s rules.

Ohio’s open burning rules prohibit the burning of any structure without first obtaining an open burning permit from the Ohio Environmental Protection Agency (Ohio EPA). The intentional burning of any structure (or part 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 first step is to determine if the burn will be used for instructional purposes. To make that determination, Ohio EPA defers to the instruction in methods of fire-fighting as recognized by the State Fire Marshal Division of the Ohio Department of Commerce and 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. If these instructions and guidelines are not followed, the burning is not considered fire training.

Asbestos Certification

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 the health of firefighters and citizens.

If the structure (this includes residential homes) meets the requirements for a fire training exercise, it must be inspected by an Ohio Asbestos Hazard Evaluation Specialist. The fire department or building owner must secure an asbestos survey and hire a licensed asbestos specialist to remove any regulated asbestos-containing material, including Category I and Category II non-friable asbestos-containing material.
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The Ohio Department of Health licenses asbestos specialists and maintains a listing at [www.odh.ohio.gov/odhPrograms/dspc/asbes1/asbestos1.aspx](http://www.odh.ohio.gov/odhPrograms/dspc/asbes1/asbestos1.aspx).

**Notification Requirements**

Ohio EPA requires fire departments to submit a *Notification of Demolition and Renovation* form at least 10 working days before any asbestos abatement or training begins. It is important to note that this form is required regardless of whether asbestos is present in the structure. Faxed forms or email attachments are not acceptable as legal documents. More information is available online at [epa.ohio.gov/Portals/41/sb/publications/asbestosnotification.pdf](http://epa.ohio.gov/Portals/41/sb/publications/asbestosnotification.pdf). If you have questions or need more information, please refer to the contact list found at [epa.ohio.gov/dapc/atu/asbestos.aspx](http://epa.ohio.gov/dapc/atu/asbestos.aspx).

Burning of any structure in Ohio is considered open burning and requires submittal of a written application for permission at least 10 working days (excluding weekends and legal holidays) before the burn. Ohio EPA’s open burning request form and the open burning contact list is located at [epa.ohio.gov/dapc/general/openburning.aspx](http://epa.ohio.gov/dapc/general/openburning.aspx). The mailing address where you need to send the completed open burning and asbestos notification applications is found on the last page of this fact sheet or at [epa.ohio.gov/dapc/general/dolaa.aspx](http://epa.ohio.gov/dapc/general/dolaa.aspx).

**Note:** While some open burning only requires notification, open burning of a structure for fire training purposes requires an open burning permit.

Asbestos-containing material can include, but is not limited to:
- roofing shingles;
- drywall;
- siding;
- mastic (i.e., glue, adhesives);
- ceiling tiles;
- wall plaster and joint compounds;
- floor tiles;
- water and steam pipe wraps and insulating material;
- plaster;
- vermiculite insulation;
- furnace insulation and older types of furnace duct tape; and
- window glazing and caulking.

To ensure the health and safety of the community and to ensure the environment is not negatively impacted, you must remove all hazardous materials prior to the burn. If you have questions concerning specific materials that must be removed prior to the burn, contact your open burning inspector. These materials can include, but are not limited to:
- vinyl siding;
- asphalt shingles;
- batteries;
- stored chemicals such as pesticides, herbicides, fertilizers, paints, glues, sealers, tars, photographic reagents;
- stored linoleum, plastics, rubber, tires or insulated wire;
- smoke alarms;
- fluorescent lights, ballasts and transformers;
- thermostats;
- electronic devices; and
- hazardous wastes.

**Note:** Under no circumstances can regulated asbestos-containing material be left in any structure being intentionally burned.

Who do I contact for help?

If you need help completing the form(s), contact the Office of Compliance Assistance and Pollution Prevention (OCAPP) at (800) 329-7518 weekdays, 8 a.m. - 5 p.m. Questions should be directed to the appropriate open burning contact listed at [epa.ohio.gov/dapc/general/openburning.aspx](http://epa.ohio.gov/dapc/general/openburning.aspx).
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County open burning and asbestos contact information can also be obtained by calling Ohio EPA’s Division of Air Pollution Control at (614) 644-2270.

Application to Conduct a Fire Training Exercise - Checklist

All of the following items must be addressed in order to receive permission to conduct a fire training exercise on any structure. Forms 1 and 2 (identified below) are required in order to receive a burn permit. Remember that you must receive written permission before the fire training exercise can begin.

Form 1: Ohio EPA Notification of Demolition & Renovation form - for burning any structure (for instance, a house, barn or garage). This form certifies that no regulated asbestos is present or that all regulated asbestos including Category I and Category II non-friable asbestos-containing material will be removed prior to the burn. The notification must identify the licensed Ohio Asbestos Hazard Evaluation Specialist that conducted the survey. Form must be postmarked or hand-delivered (not faxed) 10 week days prior to the burn and/or any asbestos abatement activities.

Note: This form is required any time a live fire is being set inside the structure, even for interior-only smoke training (room and content burns).

The Notification of Demolition & Renovation form is COMPLETE (for instance, all applicable lines are filled in and the form is signed by the fire department in charge of the training).

Note: The 10-day waiting period does not start until the complete application is postmarked or hand-delivered to Ohio EPA or applicable local air agency.

Form 2: Open Burning Permit Application for Fire Training Exercise. This form requires submittal by the fire department at least 10 working days (excluding weekends and legal holidays) before the burn.

All hazardous materials that would endanger the health and safety of the firefighters, the public and the environment have been removed. (If you have questions concerning specific materials that must be removed prior to the burn, contact your open burning inspector.)

Asphalt shingles or other petroleum based materials are NOT present. (Exceptions include interior/smoke training only where no part of the structure will be burned, when unsafe conditions prevent removal, or upon satisfactory demonstration that it is necessary to leave such items for specific training purposes. To leave asphalt shingles on the structure, however, you must first obtain approval from your open burning inspector.)

No vinyl siding is present on the structure’s exterior. (Exceptions include interior/smoke training only where no part of the structure will be burned, when unsafe conditions prevent removal, or upon satisfactory demonstration that it is necessary to leave such items for specific training purposes. To leave vinyl siding on the structure, however, you must first obtain approval from your open burning inspector.)
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This map shows jurisdictional boundaries. Shaded areas represent local agencies within Ohio EPA districts.

1. **Akron Regional Air Quality Management District**
   - Fairway Center, 1867 W Market St
   - Akron, OH 44313
   - (330) 375-2480 FAX (330) 375-2402
   - www.araqmd.org/

2. **Cleveland Dept. of Public Health Division of Air Quality**
   - 75 Eireview Plaza, 2nd Floor
   - Cleveland, OH 44114
   - (216) 664-2297 FAX (216) 420-8047
   - www.clevelandhealth.org/

3. **Portsmouth Local Air Agency**
   - 605 Washington St, Third Floor
   - Portsmouth, OH 45662
   - (740) 353-5156 FAX (740) 353-3638
   - www.portsmouthohio.org/health/air-division

4. **City of Toledo**
   - Division of Environmental Services
   - 348 South Erie Street
   - Toledo, OH 43604
   - (419) 936-3015 FAX (419) 936-3959
   - www.toledo.ohio.gov/services/public-utilities/environmental-services/

5. **Southwest Ohio Air Quality Agency**
   - 250 William Howard Taft Road
   - Cincinnati, OH 45219-2660
   - (513) 946-7777 FAX (513) 946-7778
   - www.southwestohiaoair.org/

6. **Regional Air Pollution Control Agency**
   - Public Health Dayton & Montgomery Cnty.
   - 117 South Main St
   - Dayton, OH 45422-1280
   - (937) 225-4435 FAX (937) 225-3486
   - www.dpca.org/

7. **Lake County General Health District Air Pollution Control**
   - 33 Mill Street
   - Painesville, OH 44077
   - (440) 350-2543 FAX (440) 350-2548
   - www.lcgdq.org

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*Facilities located within these jurisdictions should file air permit applications with Ohio EPA's Northeast District Office (NEDO).*