

DEQ Asbestos Regulations – What is Required?

Background of Asbestos

Asbestos is the name of a group of naturally-occurring minerals that can separate into microscopic needle-like fibers. The most common of these minerals are *Chrysotile*, *Amosite*, and *Crocidolite*. Once released into the atmosphere, the size and shape of these fibers permit them to remain airborne for long periods of time and thus contaminate a building's environment.

If inhaled, these needle-like fibers can cause three specific asbestos-related diseases: *Asbestosis* (a fibrous scarring of the lungs), *Lung Cancer*, and *Mesothelioma* (a cancer of the lining of the chest or abdominal cavity). These diseases do not develop immediately after inhalation of asbestos fibers. There is a latency period ranging from 15 to 30 years, and sometimes as long as 40 to 50 years, from first exposure to when symptoms appear.

Asbestos-Containing Materials

Asbestos has been used in more than 3,500 different products over the last 100 years, primarily due to



its thermal insulating, fire retardant, and chemical resistant properties. Some common products in buildings that may contain asbestos include, but are not limited to, pipe insulation, vinyl and asphalt floor materials, ceiling tile, spray-on fire proofing, roofing materials, boiler wrap insulation, fire doors, plaster walls, and old electrical wire insulation. Employees, tenants, and custodial maintenance workers may be exposed to ACM during maintenance, renovation, or disturbance activities.



Montana Department of Environmental Quality
Asbestos Control Program
1-406-444-5300

(Please note – this information is current as of March 2020; asbestos requirements may change as rules are reviewed and revised.)

300 copies of this public document were published at an estimated cost of \$0.486 per copy for a total of \$145.87, which includes \$145.87 for printing and \$0.00 for distribution.

Printed on recycled paper.

ASBESTOS REGULATIONS

THINK ASBESTOS BEFORE TRAINING BURNS



State and Federal Asbestos Regulations for Controlled Burns

March 2020



State and Federal Asbestos Regulations and Controlled Burns



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Fire departments use older facilities/houses for controlled burns during firefighter training. This training allows a unique opportunity for firefighters to experience a realistic situation for fire training. This brochure attempts to explain asbestos-related regulations for such training exercises which are not recognized as emergency situations.

The state and federal asbestos regulations that apply to controlled burns are the Asbestos National Emissions Standards for Hazardous Air Pollutants (NESHAP) and the Administrative Rules of Montana, Title 17, Chapter 74, subchapter 3.

NESHAP is administered by the Montana Department of Environmental Quality (DEQ) Asbestos Control Program (ACP). Because NESHAP views controlled burns as a demolition activity, NESHAP regulations apply to controlled burns. Please note: ACP must be notified prior to a controlled-burn training exercise, regardless of any local notification you may make. Please contact ACP at 406-444-5300 or deqacponline@mt.gov for specific NESHAP requirements.



Frequently Asked Questions:

A facility/house is given to the fire department for training exercises. Should it be used for a controlled burn?

If the fire department wishes to use the facility or house for a controlled burn, an asbestos building inspection by an accredited Montana (MT) asbestos inspector must be performed. This inspection must note the presence, quantity, and location of all asbestos-containing material (ACM). The ACM must be removed by a MT-accredited asbestos abatement contractor prior to the controlled burn. Once all ACM has been appropriately removed, and the site passes an air clearance test, the facility/house can be used for a controlled burn.

The facility/house is inspected for asbestos and it contains friable asbestos-containing pipe insulation and non-friable asbestos-containing roofing. Can it be utilized for search and rescue training?

The facility/house may be utilized for search and rescue training as long as the ACM is not disturbed. However, the firefighters cannot cut, remove, or otherwise damage any ACM.

Options if a facility/house is given to the fire department for training purposes are:

- A. Hire a MT-accredited asbestos inspector to inspect the facility/house and have a MT-accredited asbestos abatement contractor remove the ACM. Once abated and an air clearance passes, the building/house may be used for a controlled burn or search-and-rescue training.



- B. Have the facility/house inspected and leave the ACM in place. The building/house may be used for search-and-rescue training if the ACM is not disturbed in any way.

How can DEQ assist fire departments with asbestos-related issues?

When a facility/house is inspected by a MT-accredited asbestos inspector, the inspector should be knowledgeable in the Montana regulations and be able to detail the options available. DEQ always welcomes questions and can assist fire departments in better understanding their responsibilities.

Additionally, if a member of the fire department obtain asbestos inspector training and applies for accreditation DEQ can provide guidance and compliance assistance to ensure firefighter safety.

What other agencies might affect us?

In addition to ACP requirements, DEQ's Air Quality (ARM 17.8.615) and Solid Waste Programs, the Occupational Safety and Health Department (OSHA), and Department of Labor and Industry have requirements in place to maintain firefighter and public safety during training burns.