

DEPARTMENT OF FORESTRY AND FIRE PROTECTION
CAL FIRE
ISSUE MEMO

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To: Statewide Training and Education Advisory Committee

Concise Issue Statement:

Establish an Inter Agency Working Group to Mitigate The Loss of Training Value Due to the Required Abatement of Non-Regulated Asbestos Containing Materials (ACMs) from an Acquired Structure for Live Fire Safety Training Purposes

Brief Background:

The Fire Control 3A Live Fire Safety Training Program is adversely challenged by the inability to conduct live fire trainings in acquired structures slated for demolition due to the required abatement of asbestos containing materials (ACMs). The ACMs requiring removal are regulated by the Federal EPA, California Air Resources Board (CARB) and local Air Quality Management Districts (AQMDs). The abatement process of ACMs is regulated by CAL-OSHA, Division of Safety and Health (DOSH) under Section 1529 of the Government Code.

Typical hazard zones for ACMs are vinyl floor tiles, heating panels, exterior siding, roofing materials, acoustic ceilings, piping in commercial/industrial occupancies, drywall joint compound and seam tape. The drywall joint compound and seam tape found in homes built prior to 1973 often tests positive as contaminated with traceable amounts of ACMs. All ACMs must be removed by a DOSH approved contractor to a minimum level of .01% and 100 square feet prior to any further activity, such as fire department training.

DOSH approved contractors will remove all interior drywall to ensure total abatement of ACMs.

After removing the ACMs, there are no interior walls remaining in the structure for usable training value. The resources required to regain the training value is cost and time prohibitive to the owner and fire department. Therefore, an owner will choose to complete the demolition by mechanical methods, and the fire service loses another opportunity to provide realistic live fire safety training.

Alternative Solutions:

Alternative #1:

Establish a working group consisting of representatives from CAL FIRE/State Fire Training, Federal EPA, California Air Resources Board, CAL-OSHA and a local Air Quality staff from both a delegated and a non-delegated air district for the purpose of determining the following;

- Obtain a variance from the DOSH requirements of being a contractor while working in an acquired structure with known ACMs and until the complete free burning of the same structure.
- Review and compare regulations that may or may not require a variance especially Section 1529
- Determine ethical, fiscal and legal ramifications
- Determine if any additional training or resources are required to meet a variance, such as training for air monitoring equipment

Advantages:

- Provides a tangible safety training value from an acquired structure slated for demolition.
- The acquired structures provide real life room and content fire behavior and extinguishing properties thus adding to the safety of future firefighting efforts as compared to a fixed training facility, i. e. towers and props (*See footnote**)
- The property owner will receive the desired end result
- We are not competing with the livelihood of the abatement contractors, for they will pick up the residual debris after the training (proposal)
- Will improve the Incident Action Plan to include gross decontamination procedures to minimize Personal Exposure Limits and to keep any potential ACMs in the area of origin

Disadvantages:

- May require additional plume analysis with air monitoring equipment (Air District staff may not be able to provide plume analysis.)
- May require additional training of Fire Control Seniors to comply with ACM regulations, an activity addressed in the proposed Fire Control 3A Course Guide draft
- Uncertain as to the exact total amount of friable unregulated ACMs being released and diluted into the atmosphere

Alternative #2:

Draft a letter from STEAC to CAL-OSHA Acting Chief Len Walsh requesting a variance from Section 1529 in order to facilitate live fire safety trainings.

Advantages:

- Provides direct correspondence and the greatest proficiency

Disadvantages:

- We are asking the regulating agency to investigate our interests
- We have to accept their interpretation of the request
- Doesn't allow for stakeholders to conduct the research and earn the desired results

Alternative #3:

Establish a relationship with the DOSH approved contractors and educate them on a case by case basis of the importance of leaving the minimum .01% and 100 square feet of sheetrock with ACMs for training value

Advantages:

- The contractor will have less material to remove while providing a cost savings to the owner
- Provides a suitable "space" to conduct training since a contractor can identify the .01%, and the owner doesn't mechanically tear it down in a demolition.
- The amount of ACM material is negligible as compared to naturally existing ACMs, such as in the foothills, driveways and quarries.
- We maintain the required training values
- The fire service could propose that fire agencies be allowed to have some staff trained in the DOSH training that would be allowed to survey for just fire training purposes

Disadvantages:

- Potential conflict with the DOSH approved contractor's livelihood

- The DOSH approved contractors and the analytical lab may not leave any materials behind due to the subjectivity and uncertainty if the structure is abated as required; therefore, DOSH approved contractors may need further training/information when abating a structure that will be used for fire training purposes
- Difficult to maintain as a standard

Recommended Alternative:

Alternative #1

***Note:**

Firefighters trained with using only live fire flammable liquids and gas training simulators have a different experience of the fire environment; for example,

- *the smoke color is white not black or dark brown*
- *the interior temperature is lower*
- *the thermal layering is opposite than of a room and a contents fire*
 - *the fire produced in a simulator banks the smoke down to the floor level and leaves a clear air void at the ceiling*
- *the gas fire reacts to a hose stream by heat sensors versus sufficient application of water to the seat of the fire to prevent rekindle*
- *Allows for too much water application causing a major disruption of the thermal balance*
- *the heat produced in a gas fueled simulator is a dry heat*

End