



State of Vermont

Department of Fish and Wildlife
Department of Forests, Parks and Recreation
Department of Environmental Conservation
State Geologist
RELAY SERVICE FOR THE HEARING IMPAIRED
1-800-253-0191 TDD>Voice
1-800-253-0195 Voice>TDD

April, 2000

AGENCY OF NATURAL RESOURCES
Department of Environmental Conservation
Air Pollution Control Division
103 South Main Street
Building 3 South
Waterbury, VT 05671-0402
(802) 241-3840

Dear Fire Chief or Fire Warden:

In response to increasing concerns about toxic air pollution and the handling of potentially hazardous wastes, the Department of Environmental Conservation has updated the Fire Training Notification form (enclosed) which is required to be sent to the Agency's Air Pollution Control Division at least fourteen days prior to any fire training exercise. This notification is required by Section 5-202(3) of the Air Pollution Control Regulations (see enclosed copy). This new form supersedes all older versions which should be destroyed. Notifications sent on the older forms will not be accepted which could cause delays in your training exercise. If you need additional copies, feel free to photocopy the form, call the Air Pollution Control Division to request more copies or download it off our internet site at <http://www.anr.state.vt.us/dec/air>.

In order to minimize the generation of toxic air contaminants (and for the safety of the trainees), the DEC is now requiring that you ensure that synthetic materials, such as carpeting, linoleum, asphalt shingles, curtains, plastics and appliances, and materials containing mercury have been removed to the greatest extent possible prior to the training. This is reflected by the new form which requires your signature to a statement that you will comply with these requirements. All these materials and any ash remaining after the training must be handled with care and disposed of at a certified solid waste management facility. We are particularly concerned with the high lead content of the paints used on many of the older structures around the state. Much of this lead remains in the ash in a soluble form which could contaminate ground water. Due to the toxicity of mercury, switches and thermostats containing mercury and fluorescent lamps must also be removed. Under 10 VSA §6621(d), labeled mercury containing wastes must be handled separately and disposed of at a facility equipped to handle those wastes. Please contact your local solid waste district or town officials for details on mercury disposal. Under state law, waste districts and towns which are not part of a district are ultimately responsible for the proper disposal of mercury wastes.

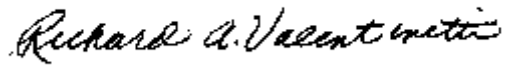
The new form also recommends that fire departments notify all nearby residents of the time and date of the training. There have been an increasing number of concerns raised by citizens concerning their safety and smoke exposures relative to fire training exercises. I encourage you to carefully evaluate sites before committing to a training exercise. Sites in more rural areas without nearby neighbors will directly impact on fewer people and will be less likely to cause controversy.

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Due to situations that have surfaced over the past couple of years, I would like to emphasize that structures used for fire training must be standing at the time of the final burn of the structure. Structures that have been razed and are "on the ground" are not considered appropriate for bona fide fire training and must therefore be disposed of properly as required for any demolition waste.

I am looking forward to working with you in the future and hope that you are able to have some productive trainings. Please contact Philip Etter of my staff at (802) 241-3847 if you have any questions concerning this letter, the enclosed form or the Air Pollution Control Regulations. You should contact Phil Cornock at the Department of Health at 1-800-439-8550 with questions regarding their requirements.

Sincerely,



Richard A. Valentinetti, Director
Air Pollution Control Division

Enclosures

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