

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT	STATUS: Effective	POLICY NUMBER: Air 027-NPD	
AGENCY NONRULE POLICY DOCUMENT SUBJECT: Open Burning of Motor Vehicles for Firefighter Training	AUTHORIZED: Keith Baugues, Assistant Commissioner		
	SUPERSEDES:	ISSUING OFFICE(S): Office of Air Quality	
	ORIGINALLY EFFECTIVE: May 12, 2001	RENEWED/REVISED:	

Disclaimer: This Nonrule Policy Document (NPD) is being established by the Indiana Department of Environmental Management (IDEM) consistent with its authority under IC 13-14-1-11.5. It is intended solely as guidance and shall be used in conjunction with applicable rules or laws. It does not replace applicable rules and laws, and if it conflicts with these rules or laws, the rules or laws shall control. Pursuant to IC 13-14-1-11.5, this policy will be available for public inspection for at least 45 days prior to presentation to the appropriate State Environmental Board, and may be put into effect by IDEM 30 days afterward. If the nonrule policy is presented to more than one board, it will be effective 30 days after presentation to the last. IDEM also will submit the policy to the Indiana Register for publication.

This NPD was reformatted according to agency standards in 2011.

1.0 PURPOSE

This NPD provides guidance for the Indiana Department of Environmental Management (IDEM) and fire departments for the conditions upon which approval may be granted by IDEM for the open burning of motor vehicles for the purpose of firefighter training under 326 IAC 4-1-4.1.

2.0 SCOPE

This NPD applies to fire departments or state or regional firefighter organizations requesting open burning approvals to burn motor vehicles for firefighter training. IDEM reviews the requests.

3.0 SUMMARY

IDEM will grant approvals for open burning of motor vehicles for firefighting training using factors listed in this policy and with standard conditions contained in this policy.

4.0 DEFINITIONS

- 4.1. "Motor vehicle" – Means, but is not limited to, an automobile, truck, tractor trailer, farm tractor, or motorcycle.
- 4.2. "Stripped" – Means that tires, foam, plastics, fluids, asbestos, mercury switches and other materials that generate toxic emissions when burned have been removed from the motor vehicle prior to the open burn.

5.0 ROLES

- 5.1. Non-IDEM parties' responsibilities:
 - A. Fire Department or state or regional firefighter organization representative:
 1. Responsible for compiling all necessary information and submitting an approval request in accordance with this policy and with the directions on application form. The approval request application form is found on the IDEM website at http://www.in.gov/idem/5157.htm#oag_compliance.

- 5.2. IDEM parties' responsibilities:
 - A. Branch Chief:
 1. Considers recommendations, approves or rejects conditions of the approval request to open burn a motor vehicle and, when appropriate, issues the approval.
 - B. Section Chief:
 1. Receives approval request, assigns appropriate reviewer, and considers recommendations regarding acceptance or rejection of the approval.
 - C. Environmental Manager:
 1. Receives assignment to review approval request from section chief, reviews request and supporting information, and makes recommendation to section chief.

6.0 POLICY

- 6.1. IDEM will review and act expeditiously upon requests made under 326 IAC 4-1-4.1 for fire training exercises, including the burning of motor vehicles. IDEM recognizes that an important public service is served by providing fire departments the opportunity for training and, especially with respect to motor vehicles, for learning how to investigate the cause of motor vehicle fires. Balanced against this is the valid policy to minimize the amount of air pollution generated by these activities and, in particular, toxic emissions from tires, foam, plastics, fluids, asbestos, mercury switches, and other materials typically found in motor vehicles.
- 6.2. For requests to burn motor vehicle open burning that have not been stripped, IDEM will use the following factors in considering whether to issue the approval:
 - A. The application for approval of the open burning event is made by a fire department of a local unit (or volunteer fire department) or by a state or regional organization of firefighters for the sole purpose of training firefighters in responding to or investigating vehicle fires;
 - B. The number of participants or number of fire districts participating; and
 - C. Personnel specifically trained in responding to or investigating motor vehicle fires will be present at the burn.

IDEM encourages that motor vehicle burns be conducted for the benefit of multiple fire departments concurrently and that only those materials needed for the purpose of the training exercise be left in the motor vehicle. IDEM also encourages that the amount of materials burned during motor vehicle burns be minimized to the extent necessary to conduct adequate fire training.
- 6.3. The following are standard conditions that apply for any approval of open burning of a motor vehicle for fire training purposes:
 - A. No motor vehicle burning shall be conducted during unfavorable meteorological conditions, such as:
 1. High winds, temperature inversions, or air stagnation;
 2. When a pollution or ozone action day has been declared.
 - B. Motor vehicle burning will be conducted in daylight hours and the fire shall be extinguished prior to sunset.
 - C. If at any time the fire creates a threat to public health or a nuisance, the fire shall be extinguished.
 - D. The local health department must be notified at least 24 hours in advance of the date, time, and location of the motor vehicle burning.
 - E. IDEM's approval letter shall be made available at the burning site to state and local officials upon request.
 - F. No motor vehicle burning will be conducted within 100 feet of any structure, power line, or other aboveground utility; or within 300 feet of a fuel storage area, pipeline, frequently traveled road, or property line of the burn site.
 - G. The motor vehicle burning will be attended at all times by trained fire personnel until completely extinguished.
 - H. All burning must comply with other federal, state, or local laws, regulations, or ordinances.

- I. Mercury switches must be removed from the vehicle and properly recycled unless the applicant demonstrates that removal is not practicable. It is recommended that the mercury switch and any Antilock Braking System (ABS) sensor be sent to a local household hazardous waste collection location for recycling. Please contact your solid waste management district or IDEM (1-800-451-6027) for the location and times of the collection sites at www.in.gov/recycle/5758.htm. The following website provides information on how to find and remove mercury switches:
<http://www.elvsolutions.org/educational.html>.

7.0 REFERENCES

- 7.1. 326 IAC 4-1-4.1, Burning Regulations, Open Burning Approval; Criteria and Conditions