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established 1959

Task Order LM00-502
Control Number 11-0092

November 10, 2010

Mr. Michael Fair
Hamilton County Environmental Services
250 William Howard Taft Road
First Floor
Cincinnati, OH 45219

SUBJECT: Open Burning Request Extension

Dear Mr. Fair:

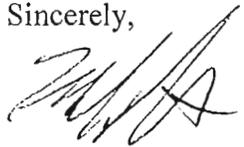
Due to the weather conditions experienced, the Fernald Preserve has not been able to complete the open burns scheduled and approved for this fall. With the November 15 completion date set by your office quickly approaching, we are requesting an extension for the following Open Burn Requests submitted on August 17, 2010:

Permission No.	Fernald Preserve Prescribed Burn Name
143130	Boot Area
143134	Nieman Grassland
143131	Skillet Burn Area
143133	Yellow Chat Grassland

We request the extension be given until December 16, 2010; if weather conditions allow, this would provide enough time to complete these burns. I recognize that all conditions stated in original permission letters would still be applicable in the extension period.

Additionally, we are submitting an additional Open Burning Request for a curb enclosed island in the site's visitors center parking lot that contains a prairie garden plot. The area is a demonstration plot for public viewing. The area contains native prairie grasses and forbs. The area is in close proximity to the Skillet Prescribed Burn and would be burned in conjunction with it. The Open Burn Request is enclosed with a map of the burn area.

Pease contact Harold Swiger at (513) 648-7528 if you have any questions or require additional information.

Sincerely,


Frank Johnston
Fernald Preserve Site Manager

Mr. Michael Fair
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FLJ/HS:dsm

Enclosure

cc: (electronic)
John Homer, Stoller
Harold Swiger, Stoller
rc-fernald
File: FER 100.02(A)

Personal Information

Full Name: **Swiger** **Harold** **E.**
Last First M.I.

Address: **S. M. STOLLER 10995 Hamilton-Cleves Hwy.**
Street Address Apartment/Unit #

Harrison **Ohio** **45030**
City State ZIP Code

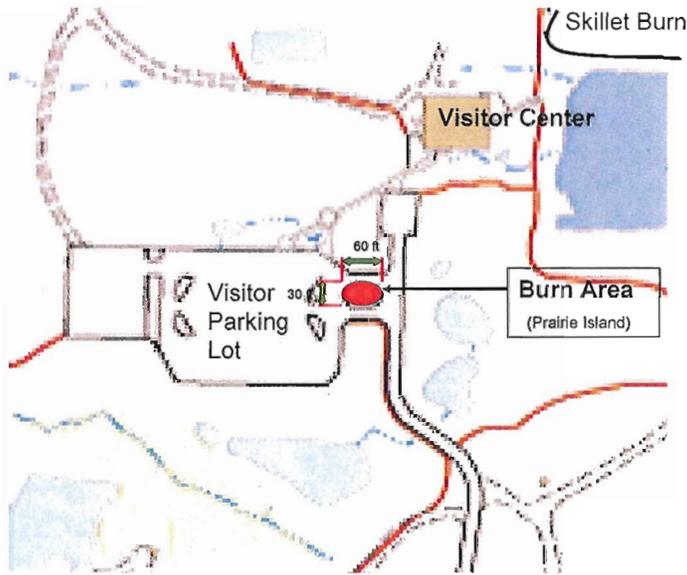
Home Phone: (513) 648-7528 Alternate Phone: (513) 484-2303

Open Burning Site Information

Burn Site Address: **7400 Willey Road**
Street Address

Crosby Township **Hamilton**
City or Township County

- 1) Provide a sketch of the burn location below or on an attached sheet. Include the location of the site and burn location within the site, nearest road intersection(s) and distance to/placement of nearest off-site structures including a map showing distances to residences, populated areas, roadways, air fields, and other pertinent landmarks.



Open Burning Request Form

2) Describe the purpose for the burn.

Choose a category:

- Land Clearing
- Recognized horticultural, silvicultural, range management or wildlife management practices
- Fires and/or pyrotechnics as part of film-making or video production
- Prevention or control of disease or pests
- Disposal of ignitable or explosive materials
- Instruction for methods of fire fighting or for research in the control of fire (complete item 4 below)

Provide a brief written description of your proposed burn:

The prairie island is a garden that was planted in species groupings to show the wildflowers that can be seen in the prairies at the Fernald Preserve. The plants have grown in very thick. The thatch is growing heavy. The burn is designed to remove heavy accumulation of thatch, Promote early growth in the spring, and remove the fuels at the entrance to visitor parking lot. The burn area is inside a curb area that is oval in shape and approximately 30 feet by 60 feet.

3) Describe the material to be burned and the quantity of the material to be burned for any category identified in 2 above except for "Instruction for methods of fire fighting or for research in the control of fire" [see the following web link for what can be burned: <http://www.epa.state.oh.us/dapc/regs/3745-19/3745-19-03.pdf>]

Fuels consist of grasses greater than 3 feet in height.

Fuel loads are moderate to high

4) To be completed if "Instruction for methods of fire fighting or for research in the control of fire" is chosen in 2, above. If a structure is to be burned for fire training purposes, call the asbestos program coordinator to obtain a copy of the NESHAPS regulations (614-644-2270).

- a. Asphalt shingles should be removed prior to burning. Have they been removed?
 Yes No Not Applicable
- b. Vinyl siding should be removed prior to burning. Has all vinyl siding been removed?
 Yes No Not Applicable
- c. Asbestos containing material may need to be removed ¹prior to burning. Friable asbestos must be removed by a licensed asbestos abatement contractor. Have all asbestos containing materials been removed?
 Yes No Not Applicable

5) Did the material to be burned originate from the same site where it is being burned?

Yes No

6) Is the burning site located within a restricted area? A restricted area is defined as the area within the boundaries of any municipal corporation (plus a 1,000 foot zone around cities having a population of 1,000 - 10,000 and a one (1) mile zone around cities greater than 10,000).

Yes No

¹ All demolition/renovation must be reported. If ACM is present, notification or approval for removal must be completed. See instructions for more details.

Open Burning Request Form

7) Provide the date(s) and Time(s) when the burning is anticipated to take place:

Begin		End	
Date	Time	Date	Time

Or,

For recognized horticultural, silvicultural, range management or wildlife management practices, please identify the range of dates and times the burn is expected to occur:

From: November 1, 2010 **To:** December 15, 2010

8) What methods or actions will be taken to reduce the emission of air contaminants?

Current and forecast meteorological data will be utilized to identify wind and atmospheric conditions for the area. The effects of smoke to the local area and the ambient air quality will be minimized by burning only on days with upward air movement. Prescribed burn will be limited to days when the air currents would lift the smoke to altitudes above 1700 feet. Weather thresholds also include direction of wind. If the smoke could be blown towards sensitive areas without sufficient atmospheric lift, then the burn would be postponed.

Fire Department Section

1) Local ordinances may prohibit burning, or require additional restrictions. Please identify the local fire department where the burn will take place. Please obtain signature of the Fire Chief (note, this is not required but failure to notify may subject you to violation of local ordinances).

Township Fire Department Section			
Fire Chief (printed name):	Bruce Downard		
Name of Fire Department:	Crosby Township Fire Department		
Address:	9139 Baughman Road	Crosby Township	45030
	<i>Street</i>	<i>City/Township</i>	<i>Zip Code</i>
Phone Number	(513) 738-1831		
Signature of Fire Chief:			
Comments from Fire Chief (if any):			

Responding Fire Department Section			
Fire Chief (printed name):	Steve Miller		
Name of Fire Department:	Ross Township Fire Department		
Address:	2567 Cincinnati-Brookeville Road	Ross Township	45013
	<i>Street</i>	<i>City/Township</i>	<i>Zip Code</i>
Phone Number	(513) 863-3410		
Signature of Fire Chief:			
Comments from Fire Chief (if any):			

Open Burning Request Form

Submission Certification

I, certify that the information set forth above is true and complete.

I realize that the Ohio EPA, after this request, may determine that the open burning is not allowed under its regulations, or may impose certain requirements as part of approval of my request, and shall notify me to that effect once they make such a determination.

In addition, I realize that no open burning shall be conducted in an area where an air pollution alert, warning, or emergency is in effect and that submission of this notification of intent does not exempt me from compliance with any other state or local regulation or ordinance.

Signature

Date

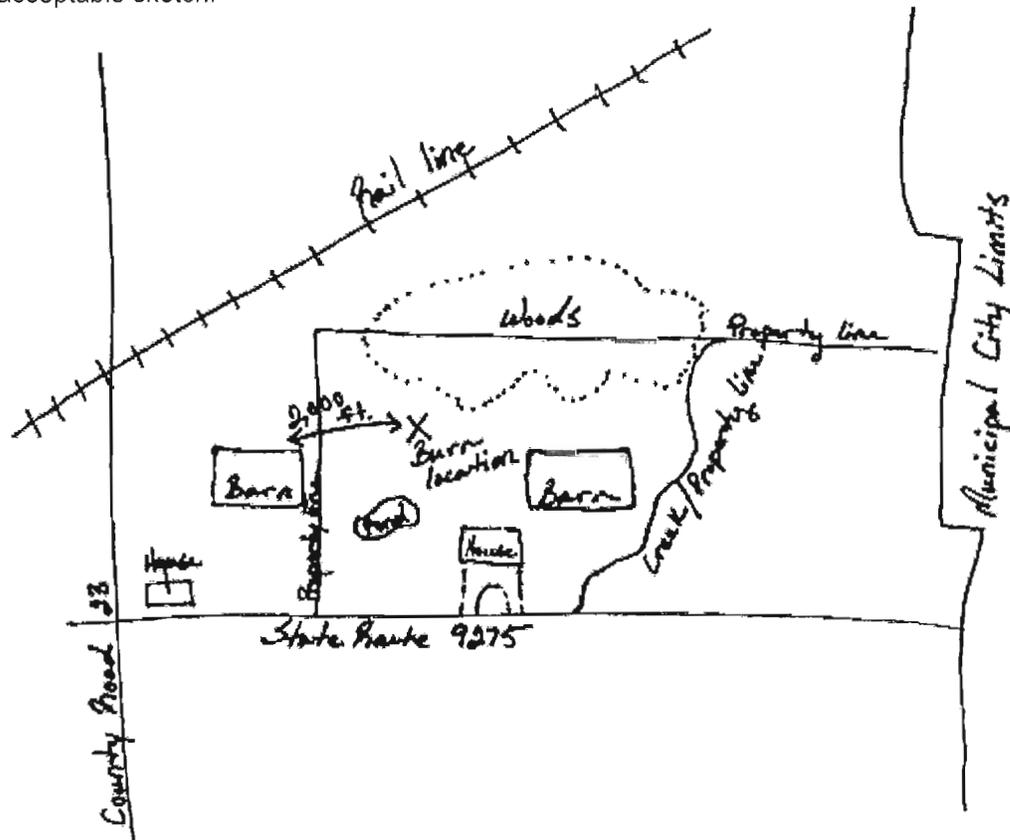
Open Burning Request Form Instructions

Personal Information

This information is used to send a letter indicating the approval or denial of the request. Please do not use a P.O. Box. The letter will be sent certified mail in order to ensure you receive a response from Ohio EPA. Phone number information allows us to contact you if we have additional questions concerning your request.

Open burning site information

- 1) A sketch of the site/location of the burn and nearby structures will allow Ohio EPA to determine if the burn will be conducted within the rule-based setback requirements. No burn is allowed within 1,000 feet of an off-site dwelling (e.g., your neighbor's house) in certain instances. Below is an example of an acceptable sketch.

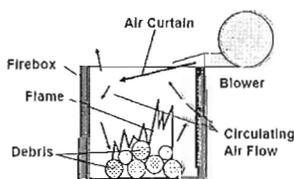


- 2) Please identify the category that best fits the reason you want to conduct a burn and describe the purpose for the burn. This information will assist Ohio EPA in determining if the requested burn is permissible under Ohio law. Please remember that if you are disposing of land clearing waste, you need to make sure the fire is set only when atmospheric conditions will readily dissipate the air contaminants; the fire does not create a visibility hazard on roadways, railroad tracks, or air fields; the fire is located at a point on the premises no less than one thousand feet from any inhabited building not located on the premises where the burn will occur; and an air curtain destructor or other device or method determined by the director to be at least as effective is used to curtail release of air contaminants.
Also, note that there are additional specific requirements when a structure is to be burned for firefighting training purposes. See item 4 below for more information.
- 3) Please describe the materials to be burned. This information is helpful in determining if the materials to be burned can be legally burned in Ohio. This is particularly important if there is a mixture of proposed materials. If there is a mixture, Ohio EPA can provide specific conditions in the approval

Open Burning Request Form Instructions

letter allowing some materials to be burned while notifying you of which other materials cannot be burned. Inadequate description of the materials to be burned may result in denial of burning certain materials that may otherwise be legal.

- 4) Certain steps have to be made before a structure can be burned for firefighting training purposes.
 - a) Petroleum-based products are prohibited from being burned in Ohio. Asphalt shingles are petroleum-based and should be removed prior to burning the structure unless they cannot be safely removed (i.e., the pre-burn structural integrity of the roof is such that the shingles cannot be removed). In most cases the shingles can be removed or removed in-part. In some cases, metal, slate, or other roof type renders this question "not applicable".
 - b) Petroleum-based products are prohibited from being burned in Ohio. Vinyl siding is petroleum-based and should be removed prior to burning the structure. Burning of vinyl siding under certain circumstances is warranted due to structural integrity issues or if the burn involves training for extinguishing exterior vinyl siding fires. In most cases the siding can be removed or removed in-part. In some cases wood, cementitious material, or other siding type renders this question "not applicable". However, please be aware of the additional limitations concerning asbestos siding as addressed in "c" below.
 - c) Asbestos containing material is very hazardous, particularly if released during burning of material it is contained in or on. All asbestos containing material, including asbestos shingles and/or siding and/or floor coverings, should be removed prior to burning a structure. Amounts greater than what is specified in Ohio Administrative Code Chapter [3745-20](#) must be removed prior to demolition. Due to the hazardous nature of asbestos, removal of asbestos containing materials must be done by licensed contractors. For additional information concerning asbestos removal requirements, see <http://www.epa.state.oh.us/dapc/atu/asbestos/asbestos.html> for more information.
- 5) The material to be burned must originate from the site where it is to be burned. Material can be moved within a contiguous site to ensure distance setback requirements for off-site structures. However, moving materials from one site to another is not permitted by rule. Please provide sufficiently detailed information in 1 above if materials are moved within the proposed site.
- 6) Ohio open burning regulations are broken down into "restricted" and "unrestricted" areas. Different standards apply based on proximity to populated areas. Please identify if your proposed burn site meets the restricted versus unrestricted area designation.
- 7) Approved open burning must be attended to during the duration of the burn. As a result, some burns may extend beyond a single day. Please identify the dates/times the burn is proposed to cover. Please note that this is not the same as multiple burns over time. For example, an individual or organization may wish to conduct silvicultural burns in the fall and spring at the same or different locations. Such burns are separate actions and each individually require a request and permission. The purpose of question 7 is to identify those burns that are intended to be continuous but cannot be due to personnel resources, expected weather conditions, etc.
- 8) Please describe any actions you will take to minimize emissions during the burn. For example, use of an air curtain destructor makes the burn more efficient (i.e., less polluting) and reduces the burn time.



There are many configurations and equipment vendors that will rent the equipment. The basic concept is provided to the left. The overflow of introduced air facilitates efficient burning in the burn pile. Other activities that minimize emissions include making sure the materials are as dry as possible to ensure an efficient burn, allowing for sufficient air inflow by other means (e.g., burning the materials on raised structure so that air can flow upward into the burn more efficiently), etc.

Fire department Section

1. Local ordinances may prohibit burning even when Ohio's open burning regulations allow burning. OAC Chapter 3745-19 is based on environmental law, not local safety and other regulations. Local safety and other regulations may require further restrictions or prohibitions.

Usually the local fire department is in the best position to identify additional local safety concerns. In addition, notifying the local fire department can ensure faster local emergency response in case something goes wrong or gets out of control. Although not required by Ohio's open burning regulations, Ohio EPA strongly urges that you get the signature from the local fire chief prior to submitting your request. A copy of the approval or denial of your request will be sent to the local fire department.

The following is a link to searching which fire department services your area:

https://www.com.state.oh.us/sfm/fire_apps/fmpr/fd_lookup/default.aspx

Or call (888) 243-0305 TOLL FREE

Submission Certification

Sign and date the request. Note the signature criteria prior to signing the request. Ohio is substantially in attainment with the national ambient air quality standards. As a result, air pollution emergencies and warnings very are rare in Ohio. The following link provides the technical criteria for air pollution emergencies and warnings: <http://www.epa.state.oh.us/dapc/regs/3745-25/3745-25-02.pdf>
In addition, it is also important to check your local forecast for weather conditions prior to burning to make sure conditions are such that they will minimize air pollution impacts.

Additional important information to note:

- The Ohio Department of Natural Resources has statutory authority for reviewing requests to conduct prescribed burns (e.g., burning off fields to promote prairie grasses). In addition, concerned with the potential for brush and forest fires, the ODNR Division of Forestry prohibits outdoor burning in rural areas between the hours of 6 a.m. and 6 p.m. during the typically dry months of March, April, May, October and November. So, regardless of if Ohio EPA grants permission to open burn from an environmental perspective, if you live in an unincorporated area, ODNR may deny permission to burn during these times/months due to fire safety concerns. For more information, see the following ODNR resources:
<http://www.dnr.state.oh.us/Portals/18/fire/pdf/OhioFireLaw.pdf>
<http://www.dnr.state.oh.us/forestry/Home/fire/wildfire/tabid/5146/Default.aspx>
- Some local jurisdictions may have additional restrictions on burning materials or burning at times that are otherwise approvable under Ohio EPA's open burning rules. The following links can be used to access Ohio township and city/village websites:
Townships via the Ohio Township Association
<http://cpmra.muohio.edu/otaohio/Websites.htm>
Cities & Villages via the Ohio Municipal League
<http://www.omloho.org/OMLMunicipalData/omlmunidata.htm>