



June 2, 2010

Attn: Rosann Foran  
National Fire Protection Association

Dear Ms. Foran:

Thank you for the opportunity to comment on NFPA's consideration to harmonize or consolidate a number of standards dealing with the combustibility of airborne solids in the workplace.

As background, the Wood Machinery Manufacturers of America (WMMA) is a trade association representing the commercial interests of over 200 US manufacturers of woodworking machinery, cutting tools and accessories, to include air handling and dust extraction systems. Together our members represent an estimated 75% of US production of woodworking equipment.

The WMMA has been very active in promoting not only the safe use of members' machinery but the safe operations of our clients' workplace. We serve as the Secretariat of an ANSI standard and years ago established a Wood Dust Task Force to ensure a safe workplace for our clients. Some of our members serve on the NFPA standard 664 Technical Committee.

Consolidation of a number of standards dealing with the issue has considerable merit. However, the resulting standard may result in a case in which "one size does not fit everyone". We have two major concerns regarding the consolidation or harmonization of standards dealing with combustibility of airborne solids in the workplace for your consideration:

1. ***The combination of NFPA 664 with other standards may not be in the interest of the woodworking industry because it could eliminate the exemption for the small wood shop*** as defined in 1.1.2 and the goal to provide for a facility that is "reasonably protected...in a cost effective manner" as stated in 4.1 of the standard.
2. The committee that will oversee the combined standard may not be balanced. That is, it may not include adequate representation from the industry (woodworking operations) that will be forced to comply with the standards and will be directly impacted economically by the specific provision of the standard.

We are hopeful the two issues will be fully addressed so as to protect section 1.4 of standard 664 and to ensure the combined committee represents the entire industry affected to include small,

medium and large woodworking facilities so critical to effective adoption and implementation of a standard for employee safety.

Again, thank you for your consideration. Please contact me if I can be of further assistance in this and related matters.

Sincerely

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