

## Seeking Input on Combining Documents

The Council reviewed the request of NFPA Staff to combine NFPA 61, NFPA 484, NFPA 654, NFPA 655, and NFPA 664 into a single document. The rationale for this request is recent investigations, some receiving national attention, by the U.S. Chemical Safety Board and OSHA have highlighted NFPA's standards as forming the only source for comprehensive coverage of the fire and explosion hazards from combustible dusts. A common factor cited as contributing to these incidents is a lack of awareness of the dangers posed by combustible dusts when they are suspended in air at the Minimum Explosible Concentration (MEC) in the presence of a viable ignition source.

At the end of 2009, OSHA announced that it would initiate a regulatory development project. In their Advanced Notice of Proposed Rulemaking (ANPR), OSHA acknowledged that one option for the regulation would be to include the NFPA standards directly as part of the regulation – incorporate them directly by reference – rather than develop a separate regulatory approach. In the background to this ANPR, OSHA noted that inconsistent requirements exist between some of the NFPA standards and these inconsistencies limit the effectiveness of their use.

At the present time, correlation between the documents is being handled through cross membership on the four committees. Though this approach has brought some consistency between NFPA 654 and 664, it would likely be a slow process to achieve overall correlation between the five standards. A more effective strategy would be to restructure the four existing committees into a Technical Correlating Committee supporting several Technical Committees.

To that end, the Council seeks input from the membership and public on the concept of combining NFPA's five combustible dust hazard process standards into a single standard under a revised committee structure. To assist with your responses, the following questions are provided:

1. Are you currently involved in the combustible dust hazard process industry?

If yes, in what sector?

- Manufacturer in process involving storing, handling or using combustible particulate solids or dusts
- Equipment manufacturer/vendor for pneumatic conveying, air material separators, dust collectors, air moving devices
- Equipment manufacturer/vendor for control systems – suppression, isolation, deflagration venting
- Testing laboratory or research
- Consulting engineer
- Insurance
- Enforcer or authority having jurisdiction in jurisdiction with industrial dust hazard processes
- Other

2. Do you currently use one or more of the NFPA combustible dust standards?

If yes, which one(s)? 61 484 654 655 664

3. OSHA has suggested that as currently structured NFPA's multiple documents on combustible dust hazard protection provide requirements that are inconsistent between dust types or possibly conflict. Do you agree with that assessment? Can you provide specific examples?

4. Should NFPA combine the current five combustible dust standards into a single document that is developed under the control of a technical correlating committee?

5. Are there other methods for achieving correlation and consistency between the documents? Please identify specific methods, if the answer is yes.

6. Are there advantages gained by having a single combustible dust standard? Please identify specific advantages, if the answer is yes.

7. Are there any disadvantages that combining the documents into a single standard would present? Please describe any.

8. Do you currently serve on or have you previously served on one or more of these current committees?

Anyone interested in commenting on the proposed combination of these documents, by using these questions as guidance, is invited to do so in writing. Responses should be sent to Codes and Standards Administration, NFPA, 1 Batterymarch Park, Quincy, MA 02169-7471, by **June 11, 2010**.