

**OSC 12**  
Ohio Safety Congress & Expo

**WELL AT HOME. SAFE AT WORK.**

**135 When the Dust Settles**

John Vielhaber

Thursday, March 29, 2:30 to 3:30 p.m.

**Ohio** Bureau of Workers' Compensation

**Nilfisk Industrial Vacuum Division**

**ONilfisk** **Nilfisk ALTO** **Nilfisk dm**

**WHEN THE DUST SETTLES:  
HOUSEKEEPING AND MAINTENANCE SOLUTIONS  
IN ACCORDANCE WITH OSHA'S  
COMBUSTIBLE DUST NEP**

*Presenter:*  
John Vielhaber, District Manager, Nilfisk Industrial Vacuums

March 29, 2012

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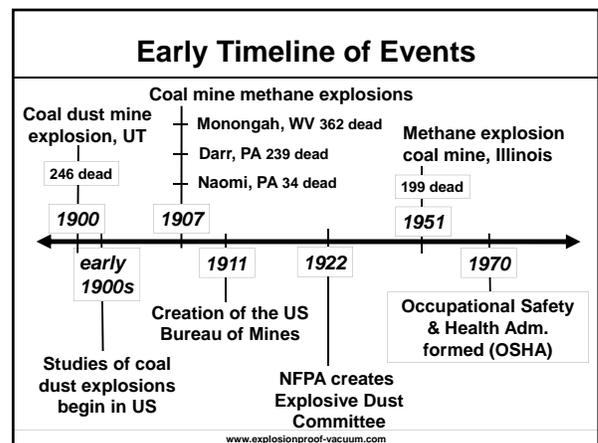
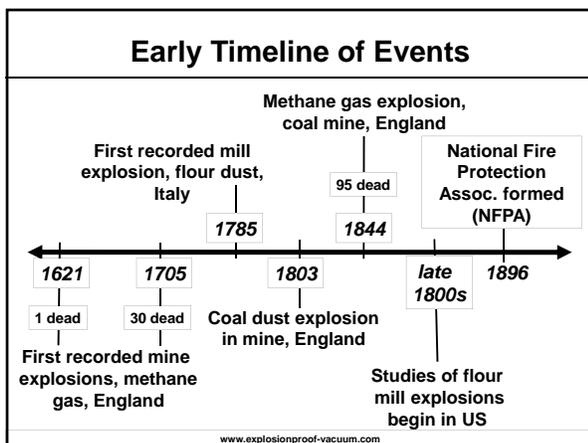
**Overview**

- History of Industrial Explosions
- What is Combustible Dust?
- Who's at Risk?
- Proper Maintenance and Housekeeping Practices
- Choosing the Right Industrial Vacuum
- Resources

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**History of Industrial Explosions**

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### Recent OSHA investigations

February 25, 1999  
Jahn Foundry  
Springfield, MA

3 dead  
9 Injured

**Cause:**  
Phenolic resin dust accumulated in ventilation ducts exploded



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### Recent OSHA investigations

February 20, 2003  
CTA Acoustics  
Corbin, KY

7 dead

**Cause:**  
Phenolic resin dust accumulated in production area exploded



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### Recent OSHA investigations

February 7, 2008  
Imperial Sugar  
Savannah, GA

14 dead  
100's injured  
\$8 million in OSHA fines

**Cause:**  
Sugar dust accumulated in production areas exploded  
The explosion at the Imperial Sugar plant was a worldwide news event which led to the creation of new standards and policies that would forever change the public's awareness to the dangers of **combustible dust**.



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### Recent OSHA investigations

THREE Incidents  
Hoeganaes  
Gallatin, TN

January 31, 2011  
(2 deaths)

March 29, 2011  
(1 seriously injured)

May 27, 2011  
(3 deaths, 2 injured)

**Cause:**  
Accumulations of fine iron powder with lack of engineering controls and basic housekeeping



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### Recent ComDust News & Events

- 3/11/ 2008: OSHA issues their National Emphasis Program on Combustible Dust
- 10/2009: NEP Status Update
  - More than 1,000 inspections conducted
  - More than 4,900 violations pursuant to combustible dust
  - 20% of violations pertain to housekeeping
- 10/21/2009: OSHA publishes advanced notice of proposed rulemaking
- 12/2009-4/2010: Combustible dust stakeholder meetings
- 4/2011: Initiate SBREFA (determine small business impact)
- 1/2012: CSB puts additional pressure on OSHA to publish a rule within one year

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## What is Combustible Dust?

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### What is Combustible Dust?

- At present there is no universal definition for combustible dust.
- The OSHA NEP defines it as “particulate solid that presents a fire or deflagration hazard when suspended in air or some other oxidizing medium over a range of concentrations, regardless of particle size or shape.”
- The NFPA defines it as “any finely divided solid material that is 420 microns or smaller in diameter that presents a fire or explosion hazard when dispersed and ignited in air.”
- Most solid organic materials, as well as many metals and some nonmetallic inorganic materials, will burn or explode if finely divided and dispersed in sufficient concentrations.

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### Dust Explosion Pentagon

5 basic elements needed for an explosion:

1. A fuel is needed to burn (combustible dust)
2. Oxygen is needed to sustain the fire (air)
3. Heat from an ignition source is needed (spark)
4. A high concentration of dust is dispersed into the air (deflagration)
5. The dust must be confined within an enclosure or structure (explosion)

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### Secondary Explosions

Enclosed conveyor belt with dust build up on inside

Primary explosion from motor sparking creates a dust cloud inside enclosure

Dust cloud ignites causing much larger secondary explosion

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### Is My Dust Combustible?

- It is up to YOU, the manufacturer, to know the composition of the material(s) you process and all applicable laws
- MSDS sheets are a starting point, but most do not address explosivity
- NFPA standards 664, 654, 499, 484 and 61 are helpful resources
- Ideally, have your dust TESTED
  - Many states offer consultation through their Department of Labor's Division of Occupational Safety eg. [www.mass.gov/dos](http://www.mass.gov/dos)
  - Private testing labs (Fauske, Chilworth, Fike, Gexcon)
  - OSHA can also provide dust testing

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## Who's at Risk?

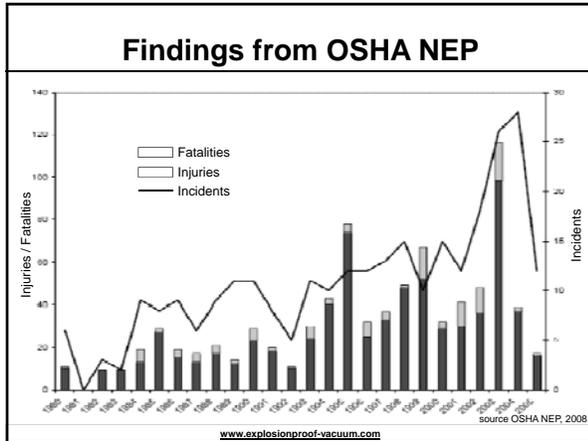
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### Who's at Risk?

**Industries having high incidence of combustible dust issues**

source OSHA NEP, 2008

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## Proper Maintenance and Housekeeping Practices

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- ### Maintenance and Housekeeping
- Develop and maintain a housekeeping program (this is something OSHA inspectors are checking for).
  - Replace mops, brooms and blow guns with more effective cleaning tools/practices. These products push dust around without removing it and can create dangerous dust clouds.
  - Limit/reduce the amount of overhead horizontal surfaces (racks, piping, ductwork, drop ceilings). These areas are hard to clean and trap dust.
  - Make sure equipment is grounded to avoid electrical and static sparking.
- 
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- ### Maintenance and Housekeeping
- NFPA 654 (2013 version) will include a Safe Housekeeping Hierarchy
1. Vacuum dust with a certified vacuum that is bonded and grounded, so it doesn't become an ignition source.
  2. Where the vacuum cannot reach, conduct a water wash down or **carefully** sweep with a broom in a manner that does not stir up dust.
  3. Finally, if the previous two measures are not effective, cleaning with compressed air is permissible **only** in small areas with operating equipment shut down.
- Source: Feed & Grain, 2012
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- ### Maintenance and Housekeeping
- Utilize vacuums for source capture and as portable suction devices to prevent fugitive dust from accumulating.
  - Make housekeeping as easy and ergonomic as possible by using lightweight, adjustable tools, flexible hoses and overhead cleaning accessories.
  - Keep dust below 1/32" on horizontal surfaces as directed in OSHA's NEP.
  - Inspect all equipment (especially older) for possible ignition sources and for needed deflagration venting upgrades.
- 
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## Choosing the Right Industrial Vacuum

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- ### Choosing the Right Industrial Vacuum
- OSHA NEP raises the issue of using “properly-equipped” industrial vacuums as defined by NFPA 654.
  - Classed materials may require an “explosion-proof/dust ignition proof” vacuum, as determined by Authorities Having Jurisdiction (AHJ) [www.reedconstructiondata.com/building-codes](http://www.reedconstructiondata.com/building-codes).
  - Shop-style vacuums can add to the risk!
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### Industrial Strength Vacuums

**Filtration**

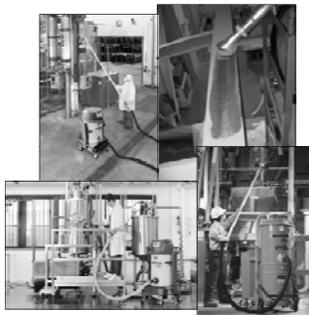
- Multiple stages/types of filtration
- HEPA/ULPA efficiency
- Automatic filter cleaning options
- Large surface area (Low ATC)

**Accessories**

- Overhead Cleaning
- Confined, hard-to-reach spaces
- High-temperature hose and tool options
- Conductive tools

**Features/Benefits**

- Cleanable/shakable filters
- Rugged, durable construction
- Collection/containment options
- Stainless steel, wet/dry models
- Ergonomic design for easy transport and disposal



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### Electric Hazardous Location Vacuums

**Electric vacuums certified as Explosion Proof/Dust-Ignition Proof by a Nationally Recognized Testing Lab**

- CSA, UL, ETL
- EXP rated TEFC motors
- EXP rated sealed switches/connections
- Internally/externally grounded (filters, body, tank, wheels, etc.)
- Conductive hose and accessories

**Beware of posers!**

- Some companies offer “dressed up” models with antistatic accessories

**Remember, investing in the proper equipment is only one part of the equation. Inspect your facility to ensure you have proper safety measures in place, including Explosion Prevention (NFPA 69) and Deflagration Venting devices (NFPA 68).**



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### Pneumatic Hazardous Location Vacuums

- Powered by compressed air (Venturi principle)
- No electrical components
- No moving parts
- Used when electricity is prohibited or unavailable

**Air-operated ≠ Explosion Proof**

- Meet the requirements for use in Class II areas
- Made of non-sparking materials
- Outfitted with conductive hose/accessories
- Grounded (bonded)



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### Common HazLoc Applications

**Industry: Aircraft Manuf., Maintenance and Refurb.**

**Location: Aircraft Hanger (Military Base)**

**Application: Dust recovery from sanding aluminum aircraft bodies. Combination of Class II, Group E (aluminum dust) being collected in a Class I, Group D rated area (presence of jet fuel)**



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### Common HazLoc Applications

**Industry:** Paper  
**Location:** Ceiling rafters and HVAC piping system.  
**Application:** Vacuuming dust from overhead piping. Class II, Group G area.



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### Common HazLoc Applications

**Industry:** Aircraft Manuf., Maintenance and Refurb.  
**Location:** Aircraft Hanger (Military Base)  
**Application:** Vacuuming up flammable fuel spill in Class I, Group D area using a combination “wet/dry” hazardous location vacuum



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### Overhead Cleaning

- Conductive hose and accessories
- Lightweight flexible hose
- Lightweight extension wands
- Colored pipe nozzles
- Wall nozzles



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### Resources

**OSHA resources:**  
 Combustible Dust NEP: [www.osha.gov/pls/oshaweb/owadisp.show\\_document?p\\_table=DIRECTIVES&p\\_id=3830](http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=DIRECTIVES&p_id=3830)  
 Fact Sheet: [http://www.osha.gov/OshDoc/data\\_General\\_Facts/OSHAcombustible\\_dust.pdf](http://www.osha.gov/OshDoc/data_General_Facts/OSHAcombustible_dust.pdf)  
 Poster: [www.osha.gov/Publications/combustible\\_dust\\_poster.pdf](http://www.osha.gov/Publications/combustible_dust_poster.pdf)

**NFPA resources:**  
 NFPA 654 Standard for the Prevention of Fire and Dust Explosions from the Manufacturing, Processing, and Handling of Combustible Particulate Solids  
<http://www.nfpa.org/abouttheCodes/>  
**FREE NFPA Codes:** [www.nfpa.org](http://www.nfpa.org)

- Click on “codes and standards,” then on the left hand side click “List of NFPA codes and standards.” Choose the standard you want to view.
- Choose “view the standard online.”
- You will be prompted to log-in or create an account. Follow the prompts to create an account. Once you validate your email address, you’ll be able to view electronic versions of the codes for free.

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### Resources

**Other resources:**  
 Authorities Having Jurisdiction:  
[www.reedconstructiondata.com/building-codes](http://www.reedconstructiondata.com/building-codes)  
 Combustible Dust Policy Institute:  
[www.dustexplosions.blogspot.com](http://www.dustexplosions.blogspot.com)  
 Nilfisk Industrial Vacuums EXP microsite:  
[www.explosionproof-vacuum.com](http://www.explosionproof-vacuum.com)

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