

Comment
Draft evaluation of Recommendation 2006-1-H-R1
(Combustible Dust Study)

The 2006 CSB Combustible Dust Study needs to be amended to include all combustible dust related incidents and not solely combustible dust related fires and explosion resulting in casualties. For example, a preliminary analysis by the Combustible Dust Policy Institute (CDPI) of 2011 National Fire Information Reporting System (NFIRS) data provided by the U.S. Fire Administration indicated over 500 combustible dust related incidents where dust was the first item ignited in manufacturing plants.

Approximately 95% of these incidents did not result in any fatalities or injuries. Near misses such as these are precursors to catastrophe as indicated in the five CSB completed combustible dust accident investigations where a prevalence of near misses is also noted in the reports.

Resources

Fact Sheet: [2011 Combustible Dust Related Incidents](#)

<http://www.slideshare.net/watermon/fact-sheet-2011-combustible-dust-related-incidents>

NFIRS [Complete Reference Guide](#) 2013

<https://www.nfirs.fema.gov/documentation/reference/>

OHS [Webinar NFIRS](#) Introduction

<http://ohsonline.com/webcasts/2013/04/combustible-dust-from-sparks-to-fires-to-explosions.aspx?admgarea=Webinar&tc=page0>

Combustible Dust Hazard Awareness Level Chart (HAL)

<http://www.slideshare.net/watermon/hal-chart>

Comment
Recommendation No. 2011-4-I-TN-R1
Hoeganaes Case Study
(combustible metal dusts including iron and steel powders)

All combustible dust generated from a diverse spectrum of industry NAICS must be acknowledged as having fire and explosion hazards. For example, the majority of combustible dust related incidents occur in NAICS not recognized in Appendix D-1 and D-2 of the OSHA Combustible Dust National Emphasis Program (NEP). Its imperative stakeholders become proactive instead of reactive in waiting for another catastrophe in NAICS not recognized in the OSHA ComDust NEP as witnessed in the Hoeganaes catastrophe.

Question
CSB Combustible Dust Recommendations Hearing

When is the Chemical Safety Board going to begin including the importance of the fire service in key findings and recommendations in conjunction with combustible dust case studies and accident investigation reports?

For example, it's the fire service responding to combustible dust related incidents on a daily basis in addition to providing crucial data in NFIRS reporting regarding factors contributing to ignition of combustible particulate solids. To fully address combustible dust workplace hazards a diverse spectrum of stakeholders must work in a collaborative nature at the federal, state, and local levels.

Combustible dust is primarily a fire problem and secondarily an explosion issue. The prevention of fires is a local issue and cannot effectively be regulated at the federal level without assistance from local building inspectors, fire marshals, fire inspectors, and fire departments.