

AF&PA Summary of OSHA Combustible Dust Guidance

Background:

OSHA enforcement officials had been conducting mill inspections and issuing warnings or citations based on inappropriate combustible dust accumulation thresholds. Inspectors were using a 1/32 inch layer criterion. This reflected coal dust – not tissue or wood dust. AF&PA believed this standard was never intended to be used to establish an accumulation threshold for these materials, and was an inappropriate measure for an enforceable standard.

OSHA's Clarified Enforcement Position:

1. In April 2015, OSHA issued revised guidance to its inspectors regarding enforcement protocols for combustible dusts (CD) with low bulk densities, such as tissue paper dust.
2. Under the new guidance, a citation alleging an excessive CD accumulation (posing a flash fire or explosion hazard) must be supported by a factual demonstration that the accumulated mass of CD exceeds the mass represented by a 1/32 inch layer of combustible dust with a bulk density of 75 lb/ft³ covering 5% of the floor area of the room or building (up to a maximum of 1,000 ft² in a room or building of more than 20,000 ft²).

Implementation:

The new guidance explicitly acknowledges that low bulk density dusts, **such as tissue paper dusts**, may not present a hazard even at an accumulation level of ¼ inch or more. Instead of relying on the old 1/32 inch layer criterion, OSHA inspectors are asked to send samples of low bulk density dusts to OSHA's Salt Lake City Technical Center ("SLTC") for bulk density determination where the inspectors believe accumulations may be excessive. Generally, this would be in situations where: (1) the layer thickness is greater than ¼ inch and not more than one inch; and (2) the accumulation extends over five percent of the floor area of a room or a building or 1000 ft², whichever is less.

OSHA indicates that if "dust accumulations are documented to exceed one inch in depth (extending over five percent of the floor area of a room or a building, or 1000 ft², whichever is less), samples of the dust do not need to be submitted to SLTC for bulk density determination. In these situations, information on the approximate bulk densities of the combustible dust may be obtained from various sources, including the employer or the internet.

The official April 21, 2015, OSHA guidance memorandum can be accessed here: www.osha.gov/dep/enforcement/Combustible_Dusts_04212015.html