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National Fire Protection Association

1 Batterymarch Park, Quincy, MA 02169-7471 Phone: 617-770-3000 • Fax: 617-770-0700 • www.nfpa.org

TECHNICAL COMMITTEE ON HANDLING AND CONVEYING OF DUSTS, VAPORS, AND GASES

NFPA 654 CMD-HAP (A2016)
Second Draft Meeting
July 21 – 23, 2015
Hilton Salt Lake City Center
255 S. West Temple
Salt Lake City, UT 84101

- 1. Meeting is called to order at 8 AM each day.
- 2. Welcome and Self-Introduction of Committee Members and Guests
- 3. Chair and Staff Liaison Remarks
- 4. Approve Minutes from the last meeting (attached)
- 5. Task Group Reports
- 6. Fike presentation (experimental data for 7.1.6.2)
- 5. Review of Correlating Committee Notes
- 6. NFPA 654 Second Draft Comments
 - a. Public Comments
 - b. Committee Comments develop and action as required
- 7. Other Business
- 9. Adjournment Meeting will adjourn at 5 pm each day.

Address List No Phone

06/23/2015 Susan Bershad

Handling and Conveying of Dusts, Vapors, and Gases Combustible Dusts

CMD-HAP

Mark L. Runyon	T 1/10/2009	Brice Chastain	TT 10/20/2000
Chair	1 1/10/2008 CMD-HAP		U 10/28/2008 CMD-HAP
Marsh Risk Consulting	CMD-HAI	Georgia-Pacific LLC	CMD-HAI
111 SW Columbia, Suite 500		133 Peachtree Street NE, 9th Floor	
Portland, OR 97201		Atlanta, GA 30303	
2 011.411.5, 020 7, 201		1.11.11.11.11.11.11.11.11.11.11.11.11.1	
John M. Cholin	SE 1/1/1992	Ashok Ghose Dastidar	SE 10/28/2014
Principal	CMD-HAP	Principal	CMD-HAP
J. M. Cholin Consultants Inc.		Fauske & Associates, LLC	
101 Roosevelt Drive		16W070 83rd Street	
Oakland, NJ 07436		Burr Ridge, IL 60527-5802	
		Alternate: Martin P. Clouthier	
Burke Desautels	M 03/07/2013	Tony DiLucido	I 8/5/2009
Principal	CMD-HAP	Principal	CMD-HAP
Fenwal/IEP Technologies		Zurich Risk Engineering Services	
400 Main Street		720 Ash Avenue	
Ashland, MA 01721-2150		Collingdale, PA 19023	
Alternate: Randal R. Davis		Alternate: Robert D. Shafto	
Vahid Ebadat	SE 7/1/1996	Henry L. Febo, Jr.	I 4/1/1996
Principal	CMD-HAP	Principal	CMD-HAP
Chilworth Technology Inc.		FM Global	
113 Campus Drive		Engineering Standards	
Princeton, NJ 08540		1151 Boston-Providence Turnpike	
Alternate: C. James Dahn		PO Box 9102	
		Norwood, MA 02062-9102	
Larry D. Floyd	U 8/5/2009	Walter L. Frank	SE 7/1/1994
Principal	CMD-HAP	Principal	CMD-HAP
BASF		Frank Risk Solutions, Inc.	
1379 Ciba Road		1110 Shallcross Avenue	
McIntosh, AL 36553		Wilmington, DE 19806	
Stephen T. Greeson	I 8/5/2009	Mark L. Holcomb	U 7/23/2008
Principal	CMD-HAP		CMD-HAP
HSB Professional Loss Control		Kimberly-Clark Corporation	
3410 Navasota Circle		2001 Marathon Avenue	
San Antonio, TX 78259		Neenah, WI 54956	
Jerry J. Jennett	U 1/15/1999	David C. Kirby	SE 1/1/1983
Principal	CMD-HAP		CMD-HAP
Georgia Gulf Sulfur Corporation		Baker Engineering & Risk Consultants, Inc.	
PO Box 1165		1560 Clearview Heights	
Valdosta, GA 31603-1165		Charleston, WV 25312	
Alternate: Randall Dunlap		Alternate: Philip J. Parsons	

Greensboro, NC 27313

Handling and Conveying of Dusts, Vapors, and Gases

James F. Koch	<u>U 10/28/2008</u>	Bruce McLelland	M 3/2/2010
Principal	CMD-HAP	Principal	CMD-HAP
The Dow Chemical Company		Fike Corporation	
1400 Building		704 SW 10th Street	
Midland, MI 48667		Blue Springs, MO 64015-4263	
American Chemistry Council		Alternate: Jérôme R. Taveau	
Alternate: Glenn W. Baldwin			
Jack E. Osborn	M 1/10/2008	Richard Pehrson	E 3/1/2011
Principal	CMD-HAP	Principal	CMD-HAP
Airdusco, Inc.		Pehrson Fire PC	
4739 Mendenhall Road South		7455 France Avenue South, Suite 271	
Memphis, TN 38141		Edina, MN 55435	
		International Fire Marshals Association	
Jason P. Reason	SE 3/2/2010	Ali Reza	SE 03/05/2012
Principal		Principal	CMD-HAP
Lewellyn Technology		Exponent, Inc.	
2518 Thorium Drive, Apt 3		5401 McConnell Avenue	
Greenwood, IN 46143		Los Angeles, CA 90066-7027	
Alternate: Kevin N. Jeffries		Alternate: David B. Clayton	
James L. Roberts	SE 1/1/1989	Samuel A. Rodgers	U 7/20/2000
Principal	CMD-HAP	Principal	CMD-HAP
Fluor Enterprises, Inc.		Honeywell, Inc.	
100 Fluor Daniel Drive		15801 Woods Edge Road	
Greenville, SC 29607-2762		Colonial Heights, VA 23834-6059	
Thomas C. Scherpa	U 3/21/2006	Bill Stevenson	M 1/15/1999
Principal		Principal	CMD-HAP
The DuPont Company, Inc.		CV Technology, Inc.	
71 Valley Road		15852 Mercantile Court	
Sullivan, NH 03445		Jupiter, FL 33478	
•		Alternate: Jason Krbec	
Jeffery W. Sutton	SE 3/4/2008	Robert D. Taylor	U 8/9/2011
Principal		Principal	CMD-HAP
Global Risk Consultants Corporation		PRB Coal Users Group	
350 Highway 7, Suite 220		4377 Sandra Kay Lane	
Excelsior, MN 55331-3170		Newburgh, IN 47630-8596	
Tony L. Thomas	M 10/27/2009	Erdem A. Ural	SE 7/23/2008
Principal	CMD-HAP	Principal	CMD-HAP
Flamex, Inc.		Loss Prevention Science & Technologies, Inc.	
4365 Federal Drive		2 Canton Street, Suite A2	

Stoughton, MA 02072

Address List No Phone

06/23/2015 Susan Bershad

Handling and Conveying of Dusts, Vapors, and Gases

CMD-HAP

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u	UH	v	ЭU	nic	Dи	อเอ

Michael Walters	N/L 10/27/2000	Honold H. Wohon, In	TI 1/1/1006
Principal Principal	M 10/27/2009 CMD-HAP	Harold H. Weber, Jr. Principal	<u>U 1/1/1986</u> CMD-HAP
Camfil Farr Air Pollution Control	CNID-IIAI	The Sulphur Institute	CMD-HAI
3501 South Airport Road		1020 19th Street, NW, Suite 520	
Jonesboro, AR 72401-4480		Washington, DC 20036	
		VL to Document: 655	
Glenn W. Baldwin	U 03/07/2013	David B. Clayton	SE 10/29/2012
Alternate	CMD-HAP	Alternate	CMD-HAP
The Dow Chemical Company		Exponent, Inc.	
PO Box 8361		5401 McConnell Avenue	
South Charleston, WV 25303		Los Angeles, CA 90066-7027	
American Chemistry Council		Principal: Ali Reza	
Principal: James F. Koch		•	
Martin P. Clouthier	SE 04/08/2015	C. James Dahn	SE 1/1/1989
Alternate	CMD-HAP	Alternate	CMD-HAP
Clouthier Risk Engineering		Safety Consulting Engineers Inc.	
6178 Cedar Street		2131 Hammond Drive	
Halifax, NS B3H 2J7 Canada		Schaumburg, IL 60173	
Principal: Ashok Ghose Dastidar		Principal: Vahid Ebadat	
Randal R. Davis	M 10/29/2012	Randall Dunlap	U 3/2/2010
Alternate	CMD-HAP	Alternate	CMD-HAP
IEP Technologies		Georgia Gulf Sulfur Corporation	
417-1 South Street		PO Box 67	
Marlborough, MA 01752-3149		Bainbridge, GA 39818	
Principal: Burke Desautels		Principal: Jerry J. Jennett	
Kevin N. Jeffries	SE 04/08/2015	Jason Krbec	M 3/1/2011
Alternate	CMD-HAP	Alternate	CMD-HAP
Lewellyn Technology		CV Technology, Inc.	
5478 Heathrow Avenue		15852 Mercantile Court	
Kalamazoo, MI 49009-7721		Jupiter, FL 33478	
Principal: Jason P. Reason		Principal: Bill Stevenson	
Philip J. Parsons	SE 8/9/2011	Robert D. Shafto	I 8/5/2009
Alternate	CMD-HAP	Alternate	CMD-HAP
Baker Engineering & Risk Consultants, Inc.		Zurich Insurance	
319 Stieren Street		1093 Tall Pines Trail	
San Antonio, TX 78210-1154		Highland, MI 48356	
Principal: David C. Kirby		Principal: Tony DiLucido	
Jérôme R. Taveau	M 03/07/2013	Matthew I. Chibbaro	E 3/4/2009
Alternate	CMD-HAP	Nonvoting Member	CMD-HAP
Fike Corporation		US Department of Labor	
704 SW 10th Street		Occupational Safety & Health Administration	
Blue Springs, MO 64015-4263		200 Constitution Ave. NW, Room N3609	
Principal: Bruce McLelland		Washington, DC 20210	
		Alternate: William R. Hamilton	

Address List No Phone

06/23/2015 Susan Bershad CMD-HAP

Handling and Conveying of Dusts, Vapors, and Gases

William R. HamiltonE 3/4/2009Susan Bershad04/16/2014Alt. to Nonvoting MemberCMD-HAPStaff LiaisonCMD-HAPUS Department of LaborNational Fire Protection AssociationOccupational Safety & Health Administration1 Batterymarch Park200 Constitution Ave. NW, Room N3609Quincy, MA 02169-7471

Principal: Matthew I. Chibbaro

Washington, DC 20210



TECHNICAL COMMITTEE ON HANDLING AND CONVEYING OF DUSTS, VAPORS, AND GASES

Minutes of Meeting – NFPA 654 First Draft Meeting - Continuation Web Meeting August 15, 2014, 10 AM – 1 PM ET

Member	Attending		
Mark Runyon – chair	Yes	Principal	
Brice Chastain	Yes	Principal	
John Cholin	Yes	Principal	
Burke Desautels	Yes	Principal	
Tony DiLucido	Yes	Principal	
Vahid Ebadat	No	Principal	
Henry Febo	Yes	Principal	
Larry Floyd	No	Principal	
Walter Frank	No	Principal	
Stephen Greeson	Yes	Principal	
Mark Holcomb	No	Principal	
Jerry Jennett	No	Principal	
David Kirby	No	Principal	
James Koch	No	Principal	
Bruce McLelland	No	Principal	
Jack Osborn	No	Principal	
Richard Pehrson	Yes	Principal	
Jason Reason	Yes	Principal	
Ali Reza	No	Principal	
James Roberts	No	Principal	
Samuel Rodgers	Yes	Principal	
Thomas Scherpa	No	Principal	
Bill Stevenson	Yes	Principal	
Jeffrey Sutton	No	Principal	
Robert Taylor	No	Principal	
Tony Thomas	Yes	Principal	
Erdem Ural	Yes	Principal	
Harold Weber	No	Principal	
Glenn Baldwin	Yes	Alternate	

Amy Brown	No	Alternate
David Clayton	Yes	Alternate
James Dahn	No	Alternate
Randal Davis	No	Alternate
Randall Dunlap	No	Alternate
Robert Gravell	No	Alternate
William Hilton	No	Alternate
Jason Krbec	No	Alternate
Philip Parson	Yes	Alternate
Robert Shafto	No	Alternate
Jerome Taveau	No	Alternate
Matthew Chibbaro	No	Alternate
Harry Verakis	No	Alternate
William Hamilton	No	Alternate
Niels Pedersen	Yes	Guest
Susan Bershad	Yes	NFPA
Tony Supine	Yes	Guest
Mike Walters	Yes	Guest
Guy Colonna	Yes	NFPA

- 1.0 The meeting was called to order at 10 am by Mark Runyon, chair. Staff did a roll call and noted attendance.
- 2.0 Prior to consideration of the remaining three public input from the Atlanta meeting, Niels Pedersen made a presentation providing background information for the three public input, which he submitted to the technical committee. This presentation is a rather large file, and the link to it was forwarded to the committee via e-mail subsequent to the meeting.
- 3.0 The committee considered the three remaining public input for 654, all of which were for annex material. These were PI-43, 44, and 45.
- 4.0 Camfil made a presentation on its position on PI-42. PI-42 was considered at the meeting in Atlanta. The committee response to PI -42 is FR-44. The committee did not vote to reconsider its response to PI-42 and invites Camfil and any other interested parties to submit public comment on the material. A copy of this presentation was transmitted to the committee via e-mail after the meeting.
- 5.0 The committee reviewed the membership and scope of task groups going forward. These are as listed below. If there are any committee members that would like to join one of the task groups, please let the chair or the staff know. Note that the task group leaders are designated in bold:
 - Task group to develop public comment on FR-44.
 - o Bill Stevenson, Erdem Ural
 - Task group to review PI 101 compare housekeeping requirements to 652.
 - o Tom Scherpa, Sam Rodgers, Bill Stevenson, Erdem Ural

- Task group to develop annex material for material in 10.2
 - Tony Thomas and John Cholin, Sam Rodgers.
 Scope of task group work Develop annex material to explain the material in 10.2 and to develop public comment on the first revisions in 10.2 that are consistent with the annex material. This will be presented to the TC at the second draft.
- Task group to develop public comment for FR-37 reach out to the 69 TC for participation
 - o **Erdem Ural**, Sam Rodgers, Bill Stevenson, John Cholin, and Henry Febo.
- Task group to develop public comment to annex material on abort gates (committee input response to PI- 43, 44, and 45.
 - Bill Stevenson, Erdem Ural, Tony Thomas, Niels Pedersen, and John Cholin
- 6.0 The meeting was adjourned at 1 PM ET. The next meeting of the committee will be the second draft meeting currently scheduled for July 7, 8, and 9, 2015 in Seattle, WA.



Correlating Committee Note No. 12-NFPA 654-2015 [Global Input]

Supplemental Information

File Name Description

Draft_Objectives_for_CC_review.docx

Submitter Information Verification

Submitter Full Name: Susan Bershad

Organization: National Fire Protection Assoc

Street Address:

City: State: Zip:

Submittal Date: Wed Jan 07 16:55:15 EST 2015

Committee Statement

Statement:

Committee The 654 committee should consider aligning their objectives with those presented in attached document developed by the correlating committee task group on objectives. The correlating committee would like to work towards having all of the dust documents have similar objectives. This document is a product of a task group with representation from all of the combustible dust committees and represents the direction the correlating committee would like to head in. This recommendation is also being made to the 61 and the 664 technical committees, and will be made to the 484, 655, and 652 technical committees as they enter the next revision cycle.

Ballot Results

This item has passed ballot

- 13 Eligible Voters
- 1 Not Returned
- 12 Affirmative All
- 0 Affirmative with Comments
- 0 Negative with Comments
- 0 Abstention

Not Returned

Hayden, Donald

Affirmative All

Aiken, Chris

Bujewski, Matthew J.

Cholin, John M.

Davis, Scott G.

Febo, Jr., Henry L.

Frank, Walter L.

Kreitman, Kevin

LaPine. Edward R.

Vational	Fire	Protection	Associa	tion	Report
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McAlister, Steve
Osborn, Jack E.
Stevenson, Bill
Taveau, Jérôme R.

NFPA

Correlating Committee Note No. 13-NFPA 654-2015 [Global Input]

Submitter Information Verification

Submitter Full Name: Susan Bershad

Organization: National Fire Protection Assoc

Street Address:

City: State: Zip:

Submittal Date: Wed Jan 07 17:09:33 EST 2015

Committee Statement

Committee Statement:

The correlating committee recommends that the 654 technical committee review and update if necessary, Annex B and C of the document. Both are extracted into 664 and neither has been updated over the past several revision cycles. They may be more recent material that could be

updated over the past several revision cycles. They may be more recent material that could be incorporated into both annexes. It is understood that this may not take place until the next revision cycle for 654.

Cycle 10

Ballot Results

✓ This item has passed ballot

- 13 Eligible Voters
- 1 Not Returned
- 12 Affirmative All
- 0 Affirmative with Comments
- 0 Negative with Comments
- 0 Abstention

Not Returned

Hayden, Donald

Affirmative All

Aiken, Chris

Bujewski, Matthew J.

Cholin, John M.

Davis, Scott G.

Febo, Jr., Henry L.

Frank, Walter L.

Kreitman, Kevin

LaPine, Edward R.

McAlister, Steve

Osborn, Jack E.

Stevenson, Bill

Taveau, Jérôme R.



Correlating Committee Note No. 15-NFPA 654-2015 [Global Input]

Submitter Information Verification

Submitter Full Name: Susan Bershad

Organization: National Fire Protection Assoc

Street Address:

City: State: Zip:

Submittal Date: Thu Jan 08 19:35:42 EST 2015

Committee Statement

Committee Statement:

The 654 technical committee should consider adding the language in the first draft of NFPA 61 on conflicts, section 1.4.1 and section 1.4.2.

1.4.1

Where a requirement specified in this industry-specific standard differs from a requirement specified in NFPA 652, the requirement in this standard shall be permitted to be used instead.

1.4.2

Where a requirement specified in this standard specifically prohibits a requirement specified in NFPA 652, the prohibition in this standard shall be permitted.

The Correlating Committee believes that adding this to 654 would provide clarity to the user of the document. This recommendation is also being made to the 664 technical committee and will be made to the 484 and the 655 technical committees as they enter their revisions cycles.

Ballot Results

This item has passed ballot

- 13 Eligible Voters
- 1 Not Returned
- 11 Affirmative All
- 1 Affirmative with Comments
- 0 Negative with Comments
- 0 Abstention

Not Returned

Hayden, Donald

Affirmative All

Aiken, Chris

Bujewski, Matthew J.

Cholin, John M.

Davis, Scott G.

Febo, Jr., Henry L.

Kreitman, Kevin

LaPine, Edward R.

McAlister, Steve

Osborn, Jack E.

Stevenson, Bill

Taveau, Jérôme R.

Affirmative with Comment

Frank, Walter L.

I remain uncomfortable with the approach used in NFPA-652 to handle differences in requirements between 652 and the commodity-specific standards. This CN, which would make 654 consistent with 652, provides a tool for nullifying virtually any content in 652... even though 652 is intended to provide the requirements common to all types of dusts. The wording proposed in this CN will shoulder the CC with the responsibility of ensuring that future revisions to 654 do not seek to provide inappropriate waivers of 652 requirements. This challenge will exist for all combustible dust standards as similar wording is integrated into them. I am voting affirmative only because the CC will be the authority that can apply checks and balances.



Correlating Committee Note No. 16-NFPA 654-2015 [Global Input]

Submitter Information Verification

Submitter Full Name: Susan Bershad

Organization: National Fire Protection Assoc

Street Address:

City: State: Zip:

Submittal Date: Mon Jan 12 10:20:15 EST 2015

Committee Statement

Committee The correlating committee recommends that the 654 technical committee revise the scope of the **Statement:** document to be consistent with the structure of the scope statement in NFPA 61. This scope states

the "standard provides requirements...". The correlating committee is working towards aligning the scope statements in all of the dust document to be consistent. This recommendation is also being made to the 664 TC and the 484 and 655 technical committees as they enter their revision cycles.

Ballot Results

✓ This item has passed ballot

- 13 Eligible Voters
- 1 Not Returned
- 12 Affirmative All
- 0 Affirmative with Comments
- 0 Negative with Comments
- 0 Abstention

Not Returned

Hayden, Donald

Affirmative All

Aiken, Chris

Bujewski, Matthew J.

Cholin, John M.

Davis, Scott G.

Febo, Jr., Henry L.

Frank, Walter L.

Kreitman, Kevin

LaPine, Edward R.

McAlister, Steve

Osborn, Jack E.

Stevenson, Bill

Taveau, Jérôme R.



Correlating Committee Note No. 2-NFPA 654-2015 [Global Input]

Submitter Information Verification

Submitter Full Name: Susan Bershad
Organization: [Not Specified]

Street Address:

City: State: Zip:

Submittal Date: Tue Jan 06 18:28:34 EST 2015

Committee Statement

Committee The 654 technical committee should review the responses to PI - 72, 73, 74, 75, 78, and 81. The **Statement:** terms defined in some of these public inputs are used in 654. Even if the terms are defined in 652,

the 654 technical committee should reconsider whether or not these definitions should be included

in 654. It may be easier for the user if the terms are also defined in 654.

Ballot Results

This item has passed ballot

- 13 Eligible Voters
- 1 Not Returned
- 12 Affirmative All
- 0 Affirmative with Comments
- 0 Negative with Comments
- 0 Abstention

Not Returned

Hayden, Donald

Affirmative All

Aiken, Chris

Bujewski, Matthew J.

Cholin, John M.

Davis, Scott G.

Febo, Jr., Henry L.

Frank, Walter L.

Kreitman, Kevin

LaPine, Edward R.

McAlister, Steve

Osborn, Jack E.

Stevenson, Bill

Taveau, Jérôme R.



Correlating Committee Note No. 3-NFPA 654-2015 [Global Input]

Submitter Information Verification

Submitter Full Name: Susan Bershad
Organization: [Not Specified]

Street Address:

City: State: Zip:

Submittal Date: Tue Jan 06 18:33:04 EST 2015

Committee Statement

Committee The 654 technical committee should review the definitions in Chapter 3 for consistency with 652. **Statement:** The definitions in Chapter 3 of 652 should be considered a baseline for those in the other dust

documents. In some cases, the occupancy specific document may elect to define a term differently. In those cases, the rationale for the differences should be documented. Note that this comment is also being made to the 61 and the 664 technical committees, and will be made to the 655 and 484

committees as they go through their next revision cycle.

Ballot Results

This item has passed ballot

- 13 Eligible Voters
- 1 Not Returned
- 12 Affirmative All
- 0 Affirmative with Comments
- 0 Negative with Comments
- 0 Abstention

Not Returned

Hayden, Donald

Affirmative All

Aiken, Chris

Bujewski, Matthew J.

Cholin, John M.

Davis, Scott G.

Febo, Jr., Henry L.

Frank, Walter L.

Kreitman, Kevin

LaPine, Edward R.

McAlister, Steve

Osborn, Jack E.

Stevenson, Bill

Taveau, Jérôme R.

Correlating Committee Note No. 4-NFPA 654-2015 [Global Input]

Supplemental Information

File Name

Description

652_outline_CC_meeting.docx

Submitter Information Verification

Submitter Full Name: Susan Bershad Organization: [Not Specified]

Street Address:

City: State: Zip:

Submittal Date: Tue Jan 06 18:39:04 EST 2015

Committee Statement

Committee The 654 technical committee should review the layout of the document for consistency with NFPA Statement: 652. The chapter layout for the commodity specific standards should align with the layout of NFPA 652 in order to facilitate their use with NFPA 652 in accordance with section 1.4.2 of NFPA 652. This comment is also being made to the 61 and 664 technical committees, and will be made to the 655 and 484 technical committees as they go through the next revision cycle.

> The Correlating Committee is providing an outline taken from 652 to assist the commodity specific committees with their expected alignment to 652 over the next revision cycles. In addition the outline includes the level of subsection that a user would use to compare 652 to an industry specific standard. This is the minimum level of alignment expected, the committee is free to go beyond this level. Note that the highlighted sections are those that should be used. It is expected that this may not be able to be completed in the current revision cycle, but this a goal that committees should work toward.

Ballot Results

This item has passed ballot

- 13 Eligible Voters
- 1 Not Returned
- 12 Affirmative All
- 0 Affirmative with Comments
- 0 Negative with Comments
- 0 Abstention

Not Returned

Hayden, Donald

Affirmative All

Aiken, Chris

Bujewski, Matthew J.

Cholin, John M.

Davis, Scott G.

Febo, Jr., Henry L.

Frank, Walter L.

Kreitman, Kevin

LaPine, Edward R.

McAlister, Steve

Osborn, Jack E.

Stevenson, Bill

Taveau, Jérôme R.



Correlating Committee Note No. 5-NFPA 654-2015 [Global Input]

Submitter Information Verification

Submitter Full Name: Susan Bershad
Organization: [Not Specified]

Street Address:

City: State: Zip:

Submittal Date: Tue Jan 06 18:44:59 EST 2015

Committee Statement

Committee The 654 technical committee should consider referring to Chapter 5 of 652 for testing

Statement: requirements for combustible dusts. This could be done by a reference to 652 or by extracting the

material in Chapter 5 of 652 into 654.

Ballot Results

✓ This item has passed ballot

- 13 Eligible Voters
- 1 Not Returned
- 12 Affirmative All
- 0 Affirmative with Comments
- 0 Negative with Comments
- 0 Abstention

Not Returned

Hayden, Donald

Affirmative All

Aiken, Chris

Bujewski, Matthew J.

Cholin, John M.

Davis, Scott G.

Febo, Jr., Henry L.

Frank, Walter L.

Kreitman, Kevin

LaPine, Edward R.

McAlister, Steve

Osborn, Jack E.

Stevenson, Bill

Taveau, Jérôme R.



Correlating Committee Note No. 8-NFPA 654-2015 [Global Input]

Submitter Information Verification

Submitter Full Name: Susan Bershad Organization: [Not Specified]

Street Address:

City: State: Zip:

Submittal Date: Tue Jan 06 19:15:20 EST 2015

Committee Statement

Committee The 654 technical committee should review the document to ensure that retroactivity is handled Statement: consistently. Those sections that are to be applied retroactively should be explicitly designated in the

> document section. Typically, management system elements that do not require capital improvements, such as training and housekeeping, are retroactive. This comment is also being made to the 61 and 664 technical committees and will be made to the 655 and the 484 technical

committees as they go through their next revision cycle.

Ballot Results

✓ This item has passed ballot

- 13 Eligible Voters
- 1 Not Returned
- 12 Affirmative All
- 0 Affirmative with Comments
- 0 Negative with Comments
- 0 Abstention

Not Returned

Hayden, Donald

Affirmative All

Aiken, Chris

Bujewski, Matthew J.

Cholin, John M.

Davis, Scott G.

Febo, Jr., Henry L.

Frank, Walter L.

Kreitman, Kevin

LaPine, Edward R.

McAlister, Steve

Osborn, Jack E.

Stevenson, Bill

Taveau, Jérôme R.

6/23/2015 12:42 PM 12 of 19



Correlating Committee Note No. 7-NFPA 654-2015 [Section No. 1.1.1]

Submitter Information Verification

Submitter Full Name: Susan Bershad
Organization: [Not Specified]

Street Address:

City: State: Zip:

Submittal Date: Tue Jan 06 19:04:00 EST 2015

Committee Statement

Committee The 654 technical committee should consider adding the term "flash fire" to fire and explosion hazard in this section. This would make the scope, section 1.1.1, consistent with the purpose,

section 1.1.2. The 654 technical committee should also review the rest of the document to ensure

that these terms are used consistently.

Ballot Results

✓ This item has passed ballot

- 13 Eligible Voters
- 1 Not Returned
- 12 Affirmative All
- 0 Affirmative with Comments
- 0 Negative with Comments
- 0 Abstention

Not Returned

Hayden, Donald

Affirmative All

Aiken, Chris

Bujewski, Matthew J.

Cholin, John M.

Davis, Scott G.

Febo, Jr., Henry L.

Frank, Walter L.

Kreitman, Kevin

LaPine, Edward R.

McAlister, Steve

Osborn, Jack E.

Stevenson, Bill

Taveau, Jérôme R.



Correlating Committee Note No. 11-NFPA 654-2015 [Section No. 1.4]

Submitter Information Verification

Submitter Full Name: Susan Bershad
Organization: [Not Specified]

Street Address:

City: State: Zip:

Submittal Date: Tue Jan 06 19:31:30 EST 2015

Committee Statement

Committee The 654 technical committee should consider whether or not the annex material that was added

Statement: as part of FR-2 is relevant to this section. It appears to be more appropriate to 652.

Ballot Results

This item has passed ballot

- 13 Eligible Voters
- 1 Not Returned
- 11 Affirmative All
- 0 Affirmative with Comments
- 0 Negative with Comments
- 1 Abstention

Not Returned

Hayden, Donald

Affirmative All

Aiken, Chris

Bujewski, Matthew J.

Cholin, John M.

Davis, Scott G.

Frank, Walter L.

Kreitman, Kevin

LaPine, Edward R.

McAlister, Steve

Osborn, Jack E.

Stevenson, Bill

Taveau, Jérôme R.

Abstention

Febo, Jr., Henry L.

I can't understand what is being asked



Correlating Committee Note No. 9-NFPA 654-2015 [Sections 4.3, 4.4]

Submitter Information Verification

Submitter Full Name: Susan Bershad
Organization: [Not Specified]

Street Address:

City: State: Zip:

Submittal Date: Tue Jan 06 19:21:10 EST 2015

Committee Statement

Committee The 654 technical committee should compare Sections 4.3 and 4.4, Management of Change and **Statement:** Incident Investigation, to the analogous sections in 652. The committee should determine if any

additions or omissions between the two documents are intentional or an oversight. An effort should

be made to more closely align the two documents.

Ballot Results

This item has passed ballot

- 13 Eligible Voters
- 1 Not Returned
- 11 Affirmative All
- 0 Affirmative with Comments
- 0 Negative with Comments
- 1 Abstention

Not Returned

Hayden, Donald

Affirmative All

Aiken, Chris

Bujewski, Matthew J.

Cholin, John M.

Davis, Scott G.

Frank, Walter L.

Kreitman, Kevin

LaPine, Edward R.

McAlister, Steve

Osborn, Jack E.

Stevenson, Bill

Taveau, Jérôme R.

Abstention

Febo, Jr., Henry L.

I can't understand what is being asked



Correlating Committee Note No. 6-NFPA 654-2015 [Section No. 6.3.6.1]

Submitter Information Verification

Submitter Full Name: Susan Bershad
Organization: [Not Specified]

Street Address:

City: State: Zip:

Submittal Date: Tue Jan 06 18:56:50 EST 2015

Committee Statement

Committee The 654 committee should review FR-27 as to whether or not other additional test methods should be included as part of this requirement. As a minimum, ASTM E 152, Standard Method of Fire Tests

be included as part of this requirement. As a minimum, ASTM E 152, Standard Method of Fire Tests For Door Assemblies and FM Approvals Class 4100, Approval Standard for Fire Doors, as noted in

the negative comments on the ballot, should be considered.

Ballot Results

This item has passed ballot

- 13 Eligible Voters
- 1 Not Returned
- 12 Affirmative All
- 0 Affirmative with Comments
- 0 Negative with Comments
- 0 Abstention

Not Returned

Hayden, Donald

Affirmative All

Aiken, Chris

Bujewski, Matthew J.

Cholin, John M.

Davis, Scott G.

Febo, Jr., Henry L.

Frank, Walter L.

Kreitman, Kevin

LaPine, Edward R.

McAlister, Steve

Osborn, Jack E.

Stevenson, Bill

Taveau, Jérôme R.



Correlating Committee Note No. 10-NFPA 654-2015 [Section No. 7.1.6]

Submitter Information Verification

Submitter Full Name: Susan Bershad
Organization: [Not Specified]

Street Address:

City: State: Zip:

Submittal Date: Tue Jan 06 19:25:41 EST 2015

Committee Statement

Committee The 654 technical committee should consider revising 7.1.6.2 (5) in FR-37 to include enforceable

Statement: language as per the NFPA manual of style. Note that this comment was made by several

committee members on the ballot.

Ballot Results

✓ This item has passed ballot

- 13 Eligible Voters
- 1 Not Returned
- 12 Affirmative All
- 0 Affirmative with Comments
- 0 Negative with Comments
- 0 Abstention

Not Returned

Hayden, Donald

Affirmative All

Aiken, Chris

Bujewski, Matthew J.

Cholin, John M.

Davis, Scott G.

Febo, Jr., Henry L.

Frank, Walter L.

Kreitman, Kevin

LaPine, Edward R.

McAlister, Steve

Osborn, Jack E.

Stevenson, Bill

Taveau, Jérôme R.



Correlating Committee Note No. 14-NFPA 654-2015 [Section No. 9.1.4]

Submitter Information Verification

Submitter Full Name: Susan Bershad

Organization: National Fire Protection Assoc

Street Address:

City: State: Zip:

Submittal Date: Thu Jan 08 19:10:10 EST 2015

Committee Statement

Committee The 654 technical committee should review this section in light of the response by the NFPA

Statement: technical committee to PI-52 submitted to NFPA 61. PI-52 proposed to extract this requirement from

654 into 61. The NFPA 61 committee stated that: "The committee is not sure that a design that meets this requirement exists. The committee does not want to leave this as a potential requirement

without additional information."

Ballot Results

✓ This item has passed ballot

- 13 Eligible Voters
- 1 Not Returned
- 11 Affirmative All
- 0 Affirmative with Comments
- 0 Negative with Comments
- 1 Abstention

Not Returned

Hayden, Donald

Affirmative All

Aiken, Chris

Bujewski, Matthew J.

Cholin, John M.

Davis, Scott G.

Frank, Walter L.

Kreitman, Kevin

LaPine, Edward R.

McAlister, Steve

Osborn, Jack E.

Stevenson, Bill

Taveau, Jérôme R.

Abstention

Febo, Jr., Henry L.

I can't follow the 'paper trail' to PI-52 to understand what is being requested.

Public Comment No. 2-NFPA 654-2015 [Chapter 2]

Chapter 2 Referenced Publications

2.1 General.

The documents or portions thereof listed in this chapter are referenced within this standard and shall be considered part of the requirements of this document.

Г	22	NFPA	Publications	 S.			
	<u> </u>	/\	. aphodions				

2 of 15

National Fire Protection Association, 1 Batterymarch Park, Quincy, MA 02169-7471.

NFPA 10, Standard for Portable Fire Extinguishers, 2013 edition.

NFPA 11, Standard for Low-, Medium-, and High-Expansion Foam, 2016 edition.

NFPA 12, Standard on Carbon Dioxide Extinguishing Systems, 2015 edition.

NFPA 12A, Standard on Halon 1301 Fire Extinguishing Systems, 2015 edition.

NFPA 13, Standard for the Installation of Sprinkler Systems, 2016 edition.

NFPA 14, Standard for the Installation of Standpipe and Hose Systems, 2016 edition.

NFPA 15, Standard for Water Spray Fixed Systems for Fire Protection, 2017 edition.

NFPA 16, Standard for the Installation of Foam-Water Sprinkler and Foam-Water Spray Systems, 2015 edition.

NFPA 17, Standard for Dry Chemical Extinguishing Systems, 2013 edition.

NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems, 2017 edition.

NFPA 30B, Code for the Manufacture and Storage of Aerosol Products, 2015 edition.

NFPA 33, Standard for Spray Application Using Flammable or Combustible Materials, 2016 edition.

NFPA 51B, Standard for Fire Prevention During Welding, Cutting, and Other Hot Work, 2014 edition.

NFPA 61, Standard for the Prevention of Fires and Dust Explosions in Agricultural and Food Processing Facilities, 2017 edition.

NFPA 68, Standard on Explosion Protection by Deflagration Venting, 2013 edition.

NFPA 69, Standard on Explosion Prevention Systems, 2014 edition.

NFPA 70[®], National Electrical Code[®], 2017 edition.

NFPA 72[®], National Fire Alarm and Signaling Code, 2016 edition.

NFPA 80, Standard for Fire Doors and Other Opening Protectives, 2016 edition.

NFPA 85, Boiler and Combustion Systems Hazards Code, 2015 edition.

NFPA 86, Standard for Ovens and Furnaces, 2015 edition.

NFPA 91, Standard for Exhaust Systems for Air Conveying of Vapors, Gases, Mists, and Particulate Solids, 2015 edition.

NFPA 101[®], Life Safety Code[®], 2015 edition.

NFPA 120, Standard for Fire Prevention and Control in Coal Mines, 2015 edition.

NFPA 220, Standard on Types of Building Construction, 2015 edition.

NFPA 221, Standard for High Challenge Fire Walls, Fire Walls, and Fire Barrier Walls, 2015 edition.

NFPA 252, Standard Methods of Fire Tests of Door Assemblies, 2012 edition.

NFPA 400, Hazardous Materials Code, 2016 edition.

NFPA 484, Standard for Combustible Metals, 2015 edition.

NFPA 495, Explosive Materials Code, 2013 edition.

NFPA 505, Fire Safety Standard for Powered Industrial Trucks Including Type Designations, Areas of Use, Conversions, Maintenance, and Operations, 2013 edition.

NFPA 655, Standard for Prevention of Sulfur Fires and Explosions, 2012 edition.

NFPA 664, Standard for the Prevention of Fires and Explosions in Wood Processing and Woodworking Facilities, 2017 edition.

NFPA 750, Standard on Water Mist Fire Protection Systems, 2015 edition.

NFPA 780, Standard for the Installation of Lightning Protection Systems, 2017 edition.

NFPA 1124, Code for the Manufacture, Transportation, Storage, and Retail Sales of Fireworks and

Pyrotechnic Articles, 2013 edition.

NFPA 1125, Code for the Manufacture of Model Rocket and High Power Rocket Motors, 2017 edition.

NFPA 2001, Standard on Clean Agent Fire Extinguishing Systems, 2015 edition.

NFPA 2113, Standard on Selection, Care, Use, and Maintenance of Flame-Resistant Garments for Protection of Industrial Personnel Against Short-Duration Thermal Exposures from Fire, 2015 edition.

2.3 Other Publications.

2.3.1 AMCA Publications.

Air Movement and Control Association International, Inc., 30 West University Drive, Arlington Heights, IL 60004-1893.

AMCA 99, Standards Handbook, 2010.

2.3.2 ASME Publications.

American Society of Mechanical Engineers <u>ASME International</u>, Two Park Avenue, New York, NY 10016-5990.

ASME B31.3, Process Piping, 2012 _ 2014 .

Boiler and Pressure Vessel Code, 2013 2015.

2.3.3 ASTM Publications.

ASTM International, 100 Barr Harbor Drive, P.O. Box C700, West Conshohocken, PA 19428-2959.

ASTM E2019, Standard Test Method for Minimum Ignition Energy of a Dust Cloud in Air, 2003, reapproved 2013.

ASTM E1226, Standard Test Method for Explosibility of Dust Clouds, 2012a.

2.3.4 IEC Publications.

International Electrotechnical Commission, 3, rue de Varembé, P.O. Box 131, CH-1211 Geneva 20, Switzerland.

IEC 61340-4-4, Electrostatics — Part 4-4: Standard Test Methods for Specific Applications — Electrostatic Classification of Flexible Intermediate Bulk Containers (FIBC), 2012.

2.3.5 ISA Publications.

International Society of Automation, 67 Alexander 67 <u>T.W.</u> Alexander Drive, Research Triangle Park, NC 27709.

ISA 84.00.01, Functional Safety: Application of Safety Instrumented Systems for the Process Industry Sector — Part 1: Framework, Definitions, System, Hardware and Software Requirements, 2004.

2.3.6 NEMA Publications.

National Electrical Manufacturers Association, 1300 North 17th Street, Suite 1847 _ 900 , Rosslyn Arlington , VA 22209.

NEMA 250, Enclosures for Electrical Equipment, 2008 2014.

2.3.7 U.S. Government Publications.

U.S. Government Printing Office, Washington, DC 20402.

Title 29 CFR Part 1910.242(b), "Hand and Portable Powered Tools and Equipment, General."

2.3.8 Other Publications.

Merriam-Webster's Collegiate Dictionary, 11th edition, Merriam-Webster, Inc., Springfield, MA, 2003.

2.4 References for Extracts in Mandatory Sections.

NFPA 68, Standard on Explosion Protection by Deflagration Venting, 2013 edition.

NFPA 221, Standard for High Challenge Fire Walls, Fire Walls, and Fire Barrier Walls, 2015 edition.

NFPA 484, Standard for Combustible Metals, 2015 edition.

NFPA 921, Guide for Fire and Explosion Investigations, 2014 edition.

NFPA 1250, Recommended Practice in Fire and Emergency Services Organization Risk Management, 2015 edition.

Statement of Problem and Substantiation for Public Comment

 $\label{thm:local_potential} \mbox{Updated ASME name and standard edition years.}$

Fixed ISA address.

Updated NEMA's address and standard edition year.

Related Public Comments for This Document

Related Comment

Relationship

Public Comment No. 3-NFPA 654-2015 [Chapter G]

Related Item

First Revision No. 7-NFPA 654-2014 [Chapter 2]

Submitter Information Verification

Submitter Full Name: Aaron Adamczyk
Organization: [Not Specified]

Street Address:

City: State: Zip:

Submittal Date: Sat Mar 07 21:03:24 EST 2015

5 of 15



Public Comment No. 10-NFPA 654-2015 [Section No. 6.1.1.3]

6.1.1.3 *

Dust flash-fire or dust explosion hazard areas shall additionally be determined in accordance with

any one of

the

following four methods: Layer depth criterion method

Layer Depth Citerion Method in 6.1.3 .

6.1.1.4

It shall be permitted to use

- (1) Mass method A in 6.1.4
- (2) Mass method B in 6.1.5
- (3) Risk assessment method in 6.1.6

in accordance with Chapter 5 to determine the layer depth criterion

(renumber subsequent pargraphs)

•

Statement of Problem and Substantiation for Public Comment

The area limitations of this section were added as a TIA to the 2006 edition without any experimental or loss-history validation. Indeed, the historical loss record suggests that accumulated dust layer depths far greater than permitted by the standard are necessary to propagate a deflagration through a building compartment. The equations used as the basis for this section are at this time an hypothesis - not a proven scientific fact. It is inappropriate to make an hypothesis an enforceable criterion in a minimum-compliance standard. After more than 6 years of searching I have been unable to identify a single loss incident where the dust layers were anywhere near the maximum permissible layer depth established by this standard even without the area limitations.

There is a substantial incremental cost of operations and facility design to operate some facilities at the dust layer criteria established by this section, without any demonstrable benefit in terms of life-safety or property and mission continuity. This whole section should be edited with the equations and recommendations derived from them relocated to the Annex so that the thought process is available to those who need to develop a performance-equivalent alternative layer depth criterion in accordance with Chapter 5.

Related Item

Public Input No. 84-NFPA 654-2014 [Section No. 6.1.3.2]

Submitter Information Verification

Submitter Full Name: JOHN CHOLIN

Organization: J M CHOLIN CONSULTANTS INC

Street Address:

City: State: Zip:

Submittal Date: Wed May 13 16:09:41 EDT 2015

NEPA

Public Comment No. 11-NFPA 654-2015 [Section No. 6.1.3 [Excluding any

Sub-Sections]]

A dust flash-fire or dust explosion hazard area exists when the <u>average</u> dust layer thickness measured external to process equipment <u>over the compartment area</u> exceeds the quantity determined in 6.1.3.1 or 6.1.3.2.

Statement of Problem and Substantiation for Public Comment

The area limitations of this section were added as a TIA to the 2006 edition without any experimental or loss-history validation. Indeed, the historical loss record suggests that accumulated dust layer depths far greater than permitted by the standard are necessary to propagate a deflagration through a building compartment. The equations used as the basis for this section are at this time an hypothesis - not a proven scientific fact. It is inappropriate to make an hypothesis an enforceable criterion in a minimum-compliance standard. After more than 6 years of searching I have been unable to identify a single loss incident where the dust layers were anywhere near the maximum permissible layer depth established by this standard even without the area limitations.

There is a substantial incremental cost of operations and facility design to operate some facilities at the dust layer criteria established by this section, without any demonstrable benefit in terms of life-safety or property and mission continuity. This whole section should be edited with the equations and recommendations derived from them relocated to the Annex so that the thought process is available to those who need to develop a performance-equivalent alternative layer depth criterion in accordance with Chapter 5.

Related Item

Public Input No. 85-NFPA 654-2014 [Section No. 6.1.3.2]

Submitter Information Verification

Submitter Full Name: JOHN CHOLIN

Organization: J M CHOLIN CONSULTANTS INC

Street Address:

City: State: Zip:

Submittal Date: Wed May 13 16:17:48 EDT 2015

7 of 15



Public Comment No. 12-NFPA 654-2015 [Section No. 6.1.3.2]

6.1.3.2 * - -

A dust explosion hazard and dust flash-fire hazard shall be deemed to exist in any building or room where any of the following conditions exists:

- (1) The total area of nonseparated dust accumulations exceeding the layer depth criterion is greater than 5 percent of the footprint area
- (2) -The area of any single nonseparated dust accumulation exceeding the layer depth criterion is greater than 1000 ft $\frac{2}{1000}$ (92.9 m $\frac{2}{1000}$)
- (3) -The total volume of nonseparated dust accumulations is greater than the layer depth criterion multiplied by 5 percent of the footprint area
- (4) -The total volume of any single nonseparated dust accumulation is greater than the layer depth eriterion multiplied by 1000 ft ² (92.9 m ²)

(1)

Statement of Problem and Substantiation for Public Comment

The area limitations of this section were added as a TIA to the 2006 edition without any experimental or loss-history validation. Indeed, the historical loss record suggests that accumulated dust layer depths far greater than permitted by the standard are necessary to propagate a deflagration through a building compartment. The equations used as the basis for this section are at this time an hypothesis - not a proven scientific fact. It is inappropriate to make an hypothesis an enforceable criterion in a minimum-compliance standard. After more than 6 years of searching I have been unable to identify a single loss incident where the dust layers were anywhere near the maximum permissible layer depth established by this standard even without the area limitations.

There is a substantial incremental cost of operations and facility design to operate some facilities at the dust layer criteria established by this section, without any demonstrable benefit in terms of life-safety or property and mission continuity. This whole section should be edited with the equations and recommendations derived from them relocated to the Annex so that the thought process is available to those who need to develop a performance-equivalent alternative layer depth criterion in accordance with Chapter 5.

Related Item

Public Input No. 85-NFPA 654-2014 [Section No. 6.1.3.2]

Submitter Information Verification

Submitter Full Name: JOHN CHOLIN

Organization: J M CHOLIN CONSULTANTS INC

Street Address:

City: State: Zip:

Submittal Date: Wed May 13 16:19:44 EDT 2015



Public Comment No. 6-NFPA 654-2015 [Section No. 7.14]

7.14* Abort Gates/Abort Dampers.

7.14.1 Construction.

7.14.1.1

Abort gates and abort dampers shall be constructed of noncombustible materials.

7.14.1.2

Abort gates shall be actuated by spark detection in the duct or pipe upstream of the device.

7.14.1.3*

The detection system and abort gate shall respond to prevent sparks, glowing embers, or burning materials from passing beyond the abort gate.

7.14.2 Operation.

7.14.2.1

The abort gate or abort damper shall be installed so that it diverts airflow to a restricted area to safely discharge combustion gases, flames, burning solids, or process gases or fumes.

7.14.2.2 Manual Reset.

7.14.2.2.1*

An abort gate or abort damper shall be provided with a manually activated reset located proximate to the device such that, subsequent to operation, it can be returned to the normal operating position only at the damper (gate).

7.14.2.2.2

Automatic or remote reset provisions shall not be permitted.

Additional Proposed Changes

File Name

Description Approved

brochure_diverter_-_america.pdf

DEVEX_Pneumatico_America.pdf

request_to_submit_public_comments.pdf

Statement of Problem and Substantiation for Public Comment

Our suggest is to add on NFPA 654 at paragraph C.1.1.1 the possibility to use the ABORT GATE thet close WITHOUT ELECTRICAL SIGNAL from spark or flame detector

Related Item

Public Input No. 45-NFPA 654-2014 [Section No. A.7.14]

Submitter Information Verification

Submitter Full Name: FORTE BRUNO Organization: AIRCOM SRL

Street Address:

City: State: Zip:

Submittal Date: Wed Mar 11 09:27:37 EDT 2015



Public Comment No. 8-NFPA 654-2015 [Section No. 7.14]

7.14 * _ Abort Gates/Abort Dampers.

7

14.1 Construction.

7.14.1.1

Abort gates and abort dampers shall be constructed of noncombustible materials.

7.14.1.2

Abort gates shall be actuated by spark detection in the duct or pipe upstream of the device.

7.14.1.3 * - -

The detection system and abort gate shall respond to prevent sparks, glowing embers, or burning materials from passing beyond the abort gate.

7.14.2 - Operation.

7.14.2.1 -

The abort gate or abort damper shall be installed so that it diverts airflow to a restricted area to safely discharge combustion gases, flames, burning solids, or process gases or fumes.

7.14.2.2 - Manual Reset.

7.14.2.2.1 * - -

An abort gate or abort damper shall be provided with a manually activated reset located proximate to the device such that, subsequent to operation, it can be returned to the normal operating position only at the damper (gate).

7.14.2.2.2 -

Automatic or remote reset provisions shall not be permitted.

Statement of Problem and Substantiation for Public Comment

Move this text and related annex text to Section 10.2.10 to make it clear that Abort Gates are fire protection devices, NOT deflagration isolation devices. A related comment will be submitted to revise annex text.

Related Item

Public Input No. 43-NFPA 654-2014 [Section No. A.7.1.8]

Submitter Information Verification

Submitter Full Name: John Cholin

Organization: J. M. Cholin Consultants Inc.

Street Address:

City: State: Zip:

Submittal Date: Thu Apr 09 10:10:21 EDT 2015



Public Comment No. 9-NFPA 654-2015 [New Section after 10.2.10]

TITLE OF NEW CONTENT

Type your content here ...

10.2.10.1 Construction. Abort gates and abort dampers shall be constructed

of noncombustible materials.

<u>10.2.10.2</u> Abort gates shall be actuated by spark detection in

the duct or pipe upstream of the device.

10.2.10.3* The detection system and abort gate shall respond

to prevent sparks, glowing embers, or burning materials from

passing beyond the abort gate.

10.2.10.2 Operation.

10.2.10.2.1 The abort gate or abort damper shall be installed so

that it diverts airflow to a restricted area to safely discharge combustion

gases, flames, burning solids, or process gases or fumes.

10.2.10.2.2 Manual Reset.

10.2.10.2.2.1* An abort gate or abort damper shall be provided

with a manually activated reset located proximate to the device

such that, subsequent to operation, it can be returned to

the normal operating position only at the damper (gate).

10.2.10.2.2.2 Automatic or remote reset provisions shall not be

permitted.

10.2.10.3 Control Connections

10.2.10.3.1 All fire protection abort gates or abort dampers shall be connected to the fire detection control panel via Class A or Class Deircuits as described in NFPA 72, National Fire Alarm and Signaling Code.

10.2.10.3.2 The monitoring for integrity of the actuation circuits controling abort gates shall include the continuity of the abort gate or abort damper releasing device, whether that device is a solenoid coil, detonator (explosive device) filament or other such device.

Statement of Problem and Substantiation for Public Comment

This new text is the result of the Task Group meeting held to address the issue of clearly delineating the role of abort gates as opposed to deflagration isolation devices. The text from Section 7.14 of the 2013 edition on abort gates was moved to Section 10.2.10 Abort Gates and Abort Dampers to make clear that the role of abort gates and dampers was to mitigate fire extension, NOT deflagration isolation. The existing text in Section 10.2.10 was retained. The annex material associated with the moved text should be moved accordingly.

Related Item

Public Input No. 43-NFPA 654-2014 [Section No. A.7.1.8]

Submitter Information Verification

Submitter Full Name: John Cholin

Organization: J. M. Cholin Consultants Inc.

Street Address:

City: State:

Zip:

Submittal Date: Thu Apr 09 10:19:49 EDT 2015

NFPA

Public Comment No. 3-NFPA 654-2015 [Chapter G]

Annex G Informational References

G.1 Referenced Publications.

The documents or portions thereof listed in this annex are referenced within the informational sections of this standard and are not part of the requirements of this document unless also listed in Chapter 2 for other reasons.

G.1.1 NFPA Publications.

National Fire Protection Association, 1 Batterymarch Park, Quincy, MA 02169-7471.

NFPA 15, Standard for Water Spray Fixed Systems for Fire Protection, 2017 edition.

NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems, 2017 edition.

NFPA 68, Standard on Explosion Protection by Deflagration Venting, 2013 edition.

NFPA 69, Standard on Explosion Prevention Systems, 2014 edition.

NFPA 70[®], National Electrical Code [®], 2017 edition.

NFPA 72[®], National Fire Alarm and Signaling Code, 2016 edition.

NFPA 77, Recommended Practice on Static Electricity, 2014 edition.

NFPA 91, Standard for Exhaust Systems for Air Conveying of Vapors, Gases, Mists, and Particulate Solids, 2015 edition.

NFPA 101[®], Life Safety Code[®], 2015 edition.

NFPA 252, Standard Methods of Fire Tests of Door Assemblies, 2012 edition.

NFPA 484, Standard for Combustible Metals, 2015 edition.

NFPA 499, Recommended Practice for the Classification of Combustible Dusts and of Hazardous (Classified) Locations for Electrical Installations in Chemical Process Areas, 2017 edition.

NFPA 2113, Standard on Selection, Care, Use, and Maintenance of Flame-Resistant Garments for Protection of Industrial Personnel Against Short-Duration Thermal Exposure from Fire, 2015 edition.

NFPA 5000 [®], Building Construction and Safety Code [®], 2015 edition.

SFPE Engineering Guide to Performance-Based Fire Protection Analysis and Design of Buildings, 2nd edition 2007.

G.1.2 Other Publications.

G.1.2.1 ACGIH Publications.

American Conference of Governmental Industrial Hygienists, 1330 Kemper Meadow Drive, Cincinnati, OH 45240-1634.

Industrial Ventilation: A Manual of Recommended Practice for Design, 28th edition, 2013.

G.1.2.2 AIChE Publications.

American Institute of Chemical Engineers, 120 Wall Street, FL 23, ,New York, NY 10005-4020.

AIChE G-18, Guidelines for Hazard Evaluation Procedures, 3rd edition, 2008.

AIChE Center for Chemical Process Safety, Guidelines for Safe Automation of Chemical Processes, 1993.

G.1.2.3 ASME Publications.

American Society of Mechanical Engineers <u>ASME International</u>, Two Park Avenue, New York, NY 10016-5990.

Boiler and Pressure Vessel Code, Section VIII, Division 1, 2013 _ 2015 .

ASME B - 31.3, *Process Piping*, 2012 _ 2014 .

G.1.2.4 ASTM Publications.

ASTM International, 100 Barr Harbor Drive, P.O. Box C700, West Conshohocken, PA 19428-2959.

ASTM E136, Standard Test Method for Behavior of Materials in a Vertical Tube Furnace at 750°C, 2012.

ASTM E119, Standard Test Methods for Fire Tests of Building Construction and Materials, 2012a.

ASTM E582, Standard Test Method for Minimum Ignition Energy and Quenching Distance in Gaseous Mixtures, 2013e1.

ASTM E1226, Standard Test Method for Explosibility of Dust Clouds, 2012A.

ASTM E1491, Test Method for Minimum Autoignition Temperature of Dust Clouds, 2006, reapproved 2012.

ASTM E1515, Standard Test Method for Minimum Explosible Concentration of Combustible Dusts, 2007.

ASTM E2012, Standard Guide for the Preparation of a Binary Chemical Compatibility Chart, 2006, reapproved 2012.

ASTM E2019, Standard Test Method for Minimum Ignition Energy of a Dust Cloud in Air, 2003, reapproved 2013.

ASTM E2021, Standard Test Method for Hot-Surface Ignition of Dust Layers, 2009, reapproved 2013.

G.1.2.5 IEC Publications.

International Electrotechnical Commission, 3, rue de Varembé, P.O. Box 131, CH-1211 Geneva 20, Switzerland.

IEC 61340-4-4, Electrostatics — Part 4-4: Standard Test Methods for Specific Applications — Electrostatic Classification of Flexible Intermediate Bulk Containers (FIBC), 2012.

G.1.2.6 ISO Publications.

International Organization, for Standardization, 1, ch. de la Voie-Creuse, Case postale 56, CH-1211 Geneva 20, Switzerland.

ISO 6184-1, Explosion Protection Systems — Part 1: Determination of Explosion Indices of Combustible Dusts in Air, 1985.

ISO 6184-4, Explosion Protection Systems — Part 4: Determination of Efficiency of Explosion Suppression Systems, 1985.

<u>G.1.2.7</u> USBM Publications.

U.S. Department of the Interior, Bureau of Mines Publications, National Technical Information Service (NTIS), 5285 Port Royal 5301 Shawnee Road, Springfield Alexandria, VA 22161 22312.

Conti, R. S., K. L. Cashdollar, M. Hertzberg, and I. Liebman. 1983. "Thermal and Electrical Ignitability of Dusts." U.S. Bureau of Mines, Report of Investigations, RI 8798.

G.1.2.8 U.S. Government Publications.

U.S. Government Printing Office, Washington, DC 20402.

Occupational Safety and Health Administration Act of 1970.

Title 29, Code of Federal Regulations, Part 1910.146, "Permit-Required Confined Space."

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Relationship

Referenced current or updated addresses, and standard

G.2 Informational References.

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Statement of Problem and Substantiation for Public Comment

Updated ASME name and edition years.

Updated National Technical Information Service address.

Related Public Comments for This Document

Related Comment

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[Chapter 2]

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