

[Checklist: How to Prepare for NFPA 652]

Use this handy checklist and FAQ list to help guide your NFPA 652 planning. From DHA's to specific requirements, this document is good place to start. See page 2 for the FAQ's.

1. Do you need a Dust Hazard Analysis (DHA)?

➤ Is the material combustible and/or explosible?

- Yes.** Perform a DHA by September 2018 to identify, manage, and communicate fire, flash fire, and explosion hazards. Implement a combustible dust management program to include all retroactive NFPA requirements.
- Unknown.** Test a representative sample following the sampling plan.
- No.** Maintain documentation to demonstrate that the dusts are not combustible or explosible. **If a change in the process causes a change in material, reevaluation is required.**

2. What am I responsible for?

Owner/Operator General Requirements

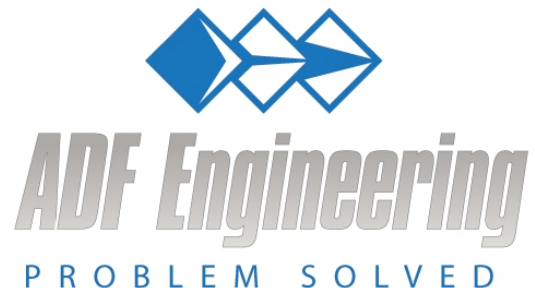
- ✓ Determine combustibility and explosibility hazards of materials
- ✓ Identify and assess any fire, flash fire, and explosion hazards (perform DHA)
- ✓ Manage identified fire, flash fire, and explosion hazards
- ✓ Communicate hazards to affected personnel

Hazard Management Mitigation and Prevention

- ✓ Building design
- ✓ Equipment design
- ✓ Housekeeping
- ✓ Ignition source control
- ✓ Personal Protective Equipment (PPE)
- ✓ Dust control
- ✓ Explosion prevention and protection
- ✓ Fire protection

Management Systems

- ✓ Operating procedures and practices
- ✓ Inspection, testing, and maintenance
- ✓ Training and hazard awareness
- ✓ Contractors
- ✓ Emergency planning and response
- ✓ Incident investigation
- ✓ Management of change
- ✓ Documentation retention
- ✓ Management systems review



Frequently Asked Questions

❑ **What makes NFPA 652 different from the previous standards?**

- Previously, there were multiple different requirements that varied across industries. NFPA 652 ties together those industry-specific codes and standards under one overarching standard that establishes minimum requirements for managing dust hazards across all industries.

❑ **If I have multiple dusts in the same area, should I test them all?**

- If it's just a few dusts, you're probably better off testing them all to be sure. However, if you have multiple materials in the same area, your best course of action would be to test the most hazardous dust in the area, and design around the most stringent conditions your facility might require based on the most explosible material. That would, in turn, cover all of your lesser dusts.

❑ **What is the effective date of NFPA 652, and when should I be in compliance?**

- This standard is technically already in effect, however, you have until September 2018 to complete your DHA and meet the compliance requirements of having a plan in place.

❑ **What particle size is classified as a dust instead of a flake or something larger?**

- Particles smaller than 420 micron are considered dusts. Anything larger would be a bead, pellet, or flake.

❑ **Can I rely on industry averages for my materials, or should I test them anyway?**

- If you're comfortable under the assumption that your facility has "ideal" conditions that won't alter or effect the industry averages, you may use them as a guide. However, almost every facility is at the mercy of environmental factors that can make their materials more or less combustible. For example, particle size, shape, and moisture percentage would all impact the combustibility at your particular facility.

❑ **How does this compare to OSHA's combustible dust standard?**

- OSHA hasn't released a standard on combustible dusts, but historically relies on the NFPA to determine best practices. So, even if there is no official word on the matter, you can reasonably expect OSHA to use NFPA 652 as their new standard guide for all facilities.

❑ **Have more questions?**

- Email ADF's combustible dust expert, Matt Williamson, at mwilliamson@adfengineering.com; or call him at 937-847-2700 x113. We'd be happy to help you prepare for the deadline and assess your facility.