

JULY 19-22, 2017 LAS VEGAS CONVENTION CENTER LAS VEGAS, NEVADA

# **Combustible Dust... Explosive Issue**



Photo: U.S. Chemical Safety Board

**WE29** 

TRACK: SAFETY & ENVIRONMENT Dust Collection And Combustible Dust for Secondary Wood Operations: Fundamentals and Safety

> Presented By: Jamison Scott Executive Vice President, Air Handling Systems

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## Overview

What is Combustible Dust?
Who's in Charge?
Can it Happen?
Prevention



Photo: U.S. Chemical Safety Board



## **Examples**

## **Air Handling Systems**





## **Examples**

Sawdust Cannon, courtesy of Navy Island





## **Examples**

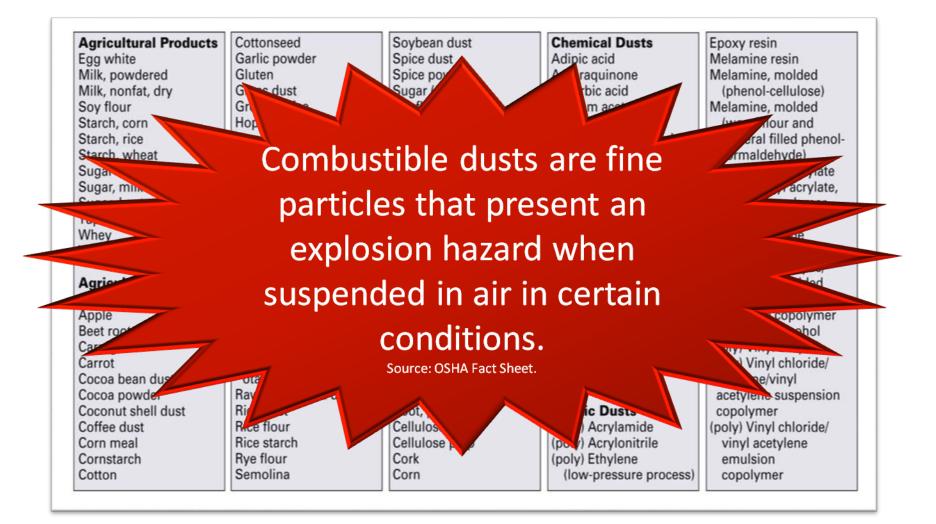
### Mythbusters - Creamer Cannon





Do proc ma	oes you ess any aterials	r cor of th in po	npa nese wvd	ny or fir produce ered for produce	m ets or m?
Agricultural Products Egg white Milk, powdered Milk, powdered Milk, nornat, dry Soy flour Starch, cron Starch, vice Starch, wheat Sugar, bent Sugar, bent Tapicca Whey Wood flour Agricultural Dusts Aflaffa Apple Best root Carron Coron seal dust Corfise dust Corn meal Cornstarch Corton	, There is poter Cationseed Gartic powder Gluten Grass dust Green coffee Hops (malted) Lemon pelel dust Lemon pulp Linseed Linseed Linseed Matt Oat prain dust Olive pellets Onion powder Parsley (dehydrated) Peach Peach Peat Peat There and skins Peat Peat Read Potato starch Rice dust Rice dust Rice dust Rice flour Bise starch Rye flour Semolina	Soybean dust Spice dust Spice dust Spice dust Sugar (10x) Sunflower se Tea Tobacco blan Tobacco blan Wheat grain - Wheat grain - Charcoal, wor Charcoal, act Charcoal,	t ed dust d dust us Dusts vated od ous um	Chemical Dusts Adipic acid Anthraquinone Anthraquinone Calcium scatte Calcium scatte Calcium scatte Calcium scatte Carboxy-methylcellulose Dextrin Lactose Lead sterate Methyl-cellulose Paraformaldehyde Sodium stearate Sodium stearate Sodi	Epoxy resin Melamine resin Melamine, molidad (phenoi-cellulose) Melamine, molidad (wood flour and mineral filled phenoi- formaldehyde) (poly) Mathyl acrylate, (poly) Mathyl acrylate, (poly) Propylene Terpene-phenol resin Urea-formaldehyde/ cellulose, molided (poly) Vinyl actatate/ ethylene copolymer (poly) Vinyl actatate/ ethylene diactate/ athylene diactate/ athylene diactate/ ethylene diactate/ athylene diactate/ athylene diactate/ athylene diactate/ athylene diactate/ athylene diactate/ athylene/pine/ acellulose, molided (poly) Vinyl actatate/ athylene/pine/ acetylene auspension copolymer
in a manner (i.e., no ideaking accumulate in the work are rescumulate in the work are quencies estabilished for fit pipes, hoods, ledges, and t within operating areas of th The working surfaces are d accumulation and facilitate Ignition Control Measure Electrically-powered clean leadrical equipment are ap Class II locations. The facility has an ignition of bonding and other methods could be generated while fr. The facility has a Hot Work ( Areas where smoking is pro Duct systems, dust collector	ping program with regular cl oper and noricontal surfaces, searns, to minimize dust accu he facility. Issigned in a manner to minir cleaning. In devices such as vacuum c proved for the hazard classifi control program, such as grour, for dissipating any electrost ansporting the dust through th	Illowed to apaning fre- such as ducts, mulations nize dust leaners, and cation for cation for cation for ding and tic charge that ie ductwork. noking" signs. ry are bonded	combustible Prevention The facility capable of 1 MSDSe for 1 normal ope Employees Protection The facility 1 Dust collect Rooms, buil rollef ventir enclosures. Explosion v The facility 1 between ple The dust co doflagration	has separator devices to remo- gniting combustible dusts, the chemicals which could beco- rations are available to employe are trained on the explosion haz	ve foreign materials me combustible dust under es. ards of combustible dusts. dings. (Some exceptions) collectors) have explosion wall of buildings and lon away from employees. deflagration propagation ductwork. tion and explosion/







## **Combustible Fine Particles**

It is not simply defining a dust, it is determining the explosibility of the dust. Important factors include, but no limited too:

- Particle Size
- Particle Shape
- Particle Aging
- Triboelectric Attraction
- Hydrogen Bonding
- Environment





## **Combustible Fine Particles**

Additionally...

 $K_{st}$  value is used as a factor in the deflagration of your dust.

Wood flour has a K<sub>st</sub> Value of >200 and 
 Strong explosion characteristic.

Dust explosion class rating system from St 0 – St 3

• e.g. Dust explosion class of wood flour is St 2.

NFPA defines the size of "Deflagrable Wood Dust" as **500 microns (.5 mm, 0.0196") or less** and has a **moisture content of less than 25%.** Material will pass through U.S. No. 35 Standard Sieve which is approx. the **"size of fairly coarse sand**". (NFPA 664 (3.3.27.1)





**Combustible Fine Particles** 

Layer Depth Criterion –

In general mfg – 1/32 in.+ depending on bulk density and

total area. (NFPA 654-2013 6.1.3.1)

Layer Thickness Criterion –

In **woodworking facilities**, a dust layer of 1/8 in. thick (over 5% of area) can be sufficient to warrant immediate cleaning of area. (NFPA 664-2012 4.2.1)





## Combustible Fine Particles If there is any doubt of combustibility, the dust must be sent to a certified facility to be tested.



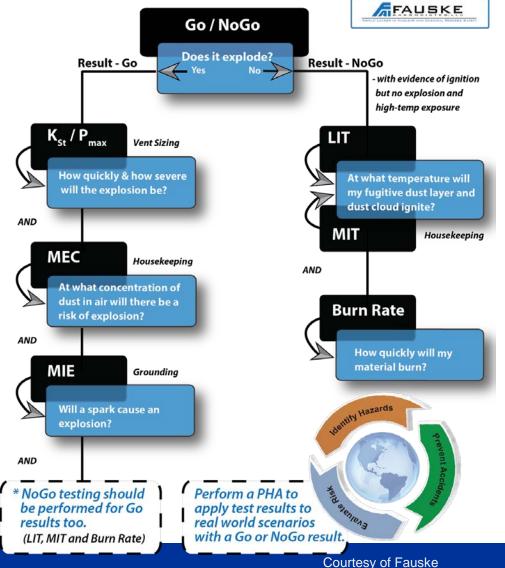


Hazard Recognition/Assessment TESTING per NFPA 652

- "go/no/go"" test: "yes, it blows up, or no, it doesn't" per <u>ASTM E 1226 Standard Test</u> <u>Method for Explosibility of Dust Clouds</u>" (NFPA 652 4.5.3.1)
- "The owner/operator of a facility with combustible particulate solids and dust shall be responsible to indentify, sample, analyze, and test materials to ensure the materials are combustible and the hazards are adequately assessed." (NFPA 652 4.4.1)
- Testing prices ranges from \$350-\$1300 up to \$3850 for a full OSHA NEP Package.









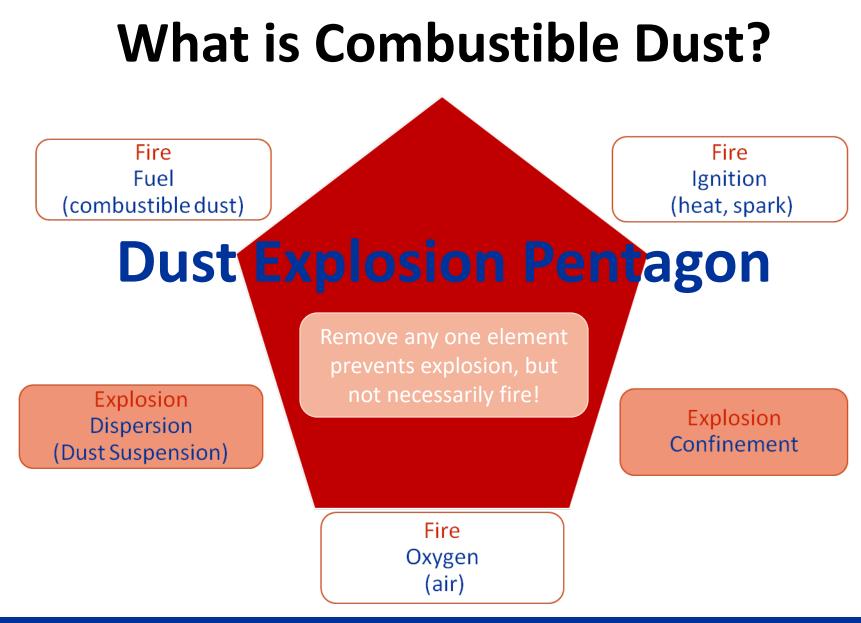
Fuel (combustible dust) lgnition (heat, spark)

# **Classic Fire Triangle**

Remove any one element eliminates the possibility of fire.

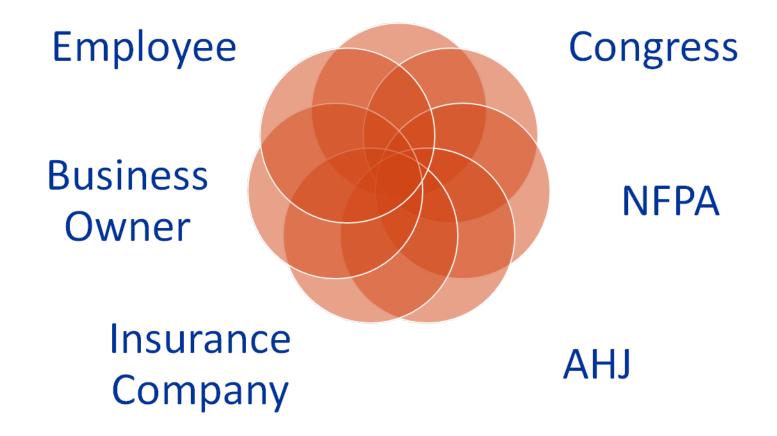
Oxygen (air)







## Who's in Charge? OSHA





2005 - Safety & Health Bulletin: <u>Combustible Dust in Industry:</u> <u>Preventing and Mitigating the Effects of Fire and Explosions</u>

**Regulatory Organizations & Agencies** 

2007 – <u>OSHA Combustible Dust National Emphasis (NEP)</u> <u>Program</u> targeted inspections on combustible dusts. Results indicated unusually high numbers of general duty clause violations, indicating a **strong need for a combustible dust standard**.



## Regulatory Organizations & Agencies **OSFIA** 2008 - <u>Hazard Alert: Combustible Dust Explosions. OSHA Fact</u> <u>Sheet</u>

2009 - <u>OSHA considers rulemaking (ANPRM) to develop a</u> <u>combustible dust standard for general industry.</u>

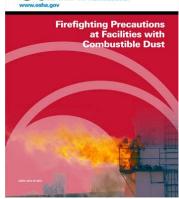
2009 – OSHA hosts first in series of Stakeholder meetings in Washington DC.



# Regulatory Organizations & Agencies

2013 – OSHA announces plan to finally initiate <u>SBREFA</u> <u>(Small Business Regulatory Enforcement Fairness Act)</u> meetings (currently on hold since 2014, possibly October 2016).

2013 - OSHA publication: <u>Firefighting</u> <u>Precautions at Facilities with</u> <u>Combustible Dust</u>





# Regulatory Organizations & Agencies

2013 - Updated Hazard Communication Standard

• According to OSHA - "Hazardous chemical" means any chemical which is classified as a physical hazard or a health hazard...combustible dust...



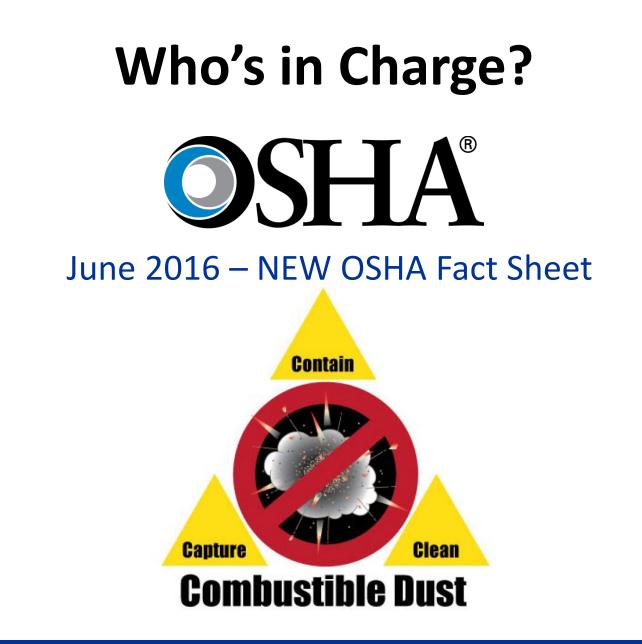
**Regulatory Organizations & Agencies** 



2015 - <u>Evaluating Hazardous Levels of Accumulation Depth for</u> <u>Combustible Dusts</u>

"The purpose of this memorandum is to provide guidance in calculating the levels of dust accumulations that may be allowed at workplaces for combustible dusts with bulk densities less than 75 lb/ft<sup>3</sup>."







June 2016 NEW OSHA Fact Sheet

## **OSHA** FactSheet

### Protecting Workers from Combustible Dust Explosion Hazards

Combustible dusts can fuel a flash fire or explosion when dispersed in a dust cloud. Workers in many industries who handle combustible solids may be exposed to combustible dust incidents that can cause catastrophic destruction, injuries and deaths. Employers and workers should take the steps below to control the fuel and prevent tragic consequences.

#### Control the Fuel (Dust) and Avoid Incidents

- Capture dust before it escapes into a work area by using properly designed, installed, approved and maintained dust collection systems.
- Contain dust within equipment, systems or rooms that are built and operated to safely handle combustible dust.
- Clean work areas, overhead surfaces and concealed spaces frequently and thoroughly using safe housekeeping methods to remove combustible dusts not captured or contained.

#### Key Responsibilities to Keep Workers Safe

Employers should determine whether dusts present in the workplace are explosible. If so, they must take proper precations to protect workers against flash fires and explosions. Resources to help employers can be found at www.osha.gov/dsg/combustibledust.

Workers must be protected from combustible dust flash fire and explosion hazards. Supervisors should be notified if proper precautions have not been taken to protect workers from combustible dust hazards.



Source: DSHA

### Examples of Potential Combustible Dust Materials

Agricultural cellulose corn egg white fertilizer flour powdered milk	Carbonaceous charcoal coal lampblack lignite	Plastic epoxy resin melamine phenolic resin polyethylene polypropylene
soy flour spices starch sugar tobacco wood flour	Metals aluminum iron magnesium titanium zirconium	Other biosolids dyes pharmaceuticals rubber soap sulfur

#### Some Dusts are Not Combustible

Certain materials in their pure chemical state will not form combustible dust, including cement, gypsum, limestone, sand and salt.



## **Regulatory Organizations & Agencies**



### U.S. Congress

- 2008 HR 5522, Worker Protection Against Combustible Dust Explosions and Fires Act of 2008 - To require the Secretary of Labor to issue interim and final occupational safety and health standards regarding worker exposure to combustible dust...
- Reintroduced in 2013 HR 691.
- Yet to be reintroduced.



**Regulatory Organizations & Agencies** 

NFPA – National Fire Protection Association – **NF** International Codes and Standards Organization that creates voluntary consensus standards.

### **Voluntary Consensus Standards** – According to OSHA:

"These standards are **NOT OSHA** regulations. However, they do provide guidance from their originating organizations related to worker protection. **In some cases, they may be mandated by state or local governments, or individual companies**."



**Regulatory Organizations & Agencies** 

NFPA – National Fire Protection Association Standards



- NFPA 654 Standard for the Prevention of Fire and Dust Explosions from the Manufacturing, Processing, and Handling of Combustible Particulate Solids
- NFPA 664 Standard for the Prevention of Fires & Explosions on Wood Processing & Woodworking Facilities
- NFPA 652 Standard on the Fundamentals of Combustible Dusts - "This standard shall provide the basic principles of and requirements for identifying and managing fire and explosion hazards of combustible dusts and particulate solids." <u>Credible Risk</u> by Guy Colonna, NFPA





**Regulatory Organizations & Agencies** 

AHJ (Authority Having Jurisdiction)

Typically government (local, state, federal or other regional) authority having jurisdiction, including but not limited too:

- Fire Marshal
- Building Inspector
- Labor Department
- Health Department
- Other Local and State Authorities
- Insurance Inspector







**Regulatory Organizations & Agencies** 

Insurance Companies FM Global – Data sheet on prevention and mitigation of combustible dust

 Describes recommended preventive measures to reduce the frequency of combustible dust explosions, and protection features to minimize damage from a combustible dust explosion.





Fred figured he didn't really need a dust collection system.

Used with permission from Steve Spiro



## Who's REALLY in Charge?

# YOU!!!!!





Photo: U.S. Chemical Safety Board



1785 – First recorded dust explosion at a flour mill in Italy.

2008 - <u>Georgia sugar refinery explosion</u> – Imperial Sugar explosion was an industrial disaster that occurred in Port Wentworth, Georgia. **Enclosed** (confined operation). Primary explosion, then secondary explosion.





- 2011 <u>Mississippi mill slapped with ComDust violations</u> \$67,800 OSHA has cited the mill for a variety of violations, including...**electrical junction box open in an area where combustible wood dust accumulates**.
- 2011 <u>ComDust Exposure Leads to Georgia Co. Fine</u> \$55,250 46 alleged safety and health hazards including worker exposure to **heavy accumulations of combustible dust.** Proposed penalties total \$55,250.
- 2011 Seating Company Slapped with fines for Combustible Dust \$117,600
   "Combustible dust, with its fine particulate composition, has the ability to create an explosive atmosphere..." said Area Director. "The accumulations of combustible dust must be removed, and a program must be put in place to prevent any potential build up from occurring."
- 2011 <u>ComDust explosion at Universal Woods injures two workers</u> -Workers were using a metal rod to unclog the dust collection filter when it apparently touched something causing a spark - triggering an explosion and resulting fireball that blasted more than 50 feet into the air.



2011 - <u>OSHA Slaps Pilgrim's Pride with fines</u> - \$85,000 ...allowed electrical components such as motors and drop lights to be subject to the accumulation of combustible dust.

2011 - <u>OSHA proposes fine for Opelika packaging</u> - \$54,880 OSHA violations involve improper housekeeping for **allowing up to 36 inches of combustible wood dust to accumulate**.

2011 - <u>Fine for exposing employees to combustible dust hazards</u> - \$58,800 "Failing to provide appropriate personal protective equipment and monitoring workers for exposure to...combustible dust puts them at an unacceptable risk for injury and illness".



2012 - <u>Babine Forest Products mills</u>, Burns Lake, B.C. Blast that killed 2 workers and injured 19 others blamed on excessive wood dust



Photo: CBC News



2012 - <u>Prince George, BC, Canada, Lakeland Mills sawmill 'ball of flame' kills 1,</u> <u>injures 24</u> (CBC Video)

- Workers say building exploded around them
- Flames at the sawmill, located about one kilometer outside the city, were reported to have shot more than 60 meters in the air.
- Some outside experts have pointed to <u>high dust levels</u> <u>and limited ventilation</u> at the mill as a possible cause.



Photo: CBC News









2012 - <u>Fire Breaks Out At Wood Pellet Plant</u> – Fire officials in Jaffrey, NH were on the scene of a three-alarm.

OSHA issued its news release mere hours after the plant sustained another fire **- it's third since 2008** - that was ignited by **sparks caused by a mechanical malfunction** of a pellet mill.



Photo: OSHA



2012 - Alabama furniture manufacturer cited by OSHA for exposing workers to combustible dust, other hazards

25 safety and health violations. OSHA initiated an inspection in Feb. as part of the agency's NEP on Amputations and its Local Emphasis Program on High Noise Industries. Proposed penalties \$94,500. **NOTE:** Nothing related to combustible dust initiated this inspection.

19 serious safety and health violations involve:

 maintain the dust collection system to prevent potential fires or explosions; install dust collection systems in areas where combustible dust is present; ensure danger signs are posted on equipment generating combustible dust; reduce the pressure on an air hose to less than 30 psi





2013 - Cardell Cabinetry LLC has been cited for combustible dust and other safety and health violations by OSHA.

- The semi-custom cabinet company faces a penalty of \$267,434 for 29 violations at the San Antonio, TX, facility.
- Cardell faces penalties of \$99,000 for the repeat failure to "remove combustible wood dust, cover electrical boxes and reduce the pressure of compressed air."
- The **repeated failure** to **remove wood dust from the parts mill area** is a \$34,034 penalty for the failure-to-abate violation.
- September 9, 2013 Cardell Cabinetry closed it doors.





2014 – Albany, NY - <u>OSHA cites cabinetry, countertop manufacturer for</u> <u>combustible dust, chemical hazards</u>

- Salko Kitchens Inc. faces proposed fines of \$51,800 for combustible dust and potential carcinogen exposure violations.
- "These workers face both immediate and long-term health and safety hazards from on-site conditions," said OSHA's area director in Albany.
   "The combustible dust can ignite and explode in seconds. For the health and well-being of its employees, it's imperative that this employer correct these hazards and take effective steps to prevent them from happening again."





2014 – U.S. Chemical Safety Board: Releases Safety Video, "Combustible Dust: Solutions Delayed"

Charleston, WV, July 16, 2014 – CSB released its final report, safety recommendations <u>and accompanying safety video</u> into a fatal combustible dust explosion at the AL Solutions metal recycling facility in New Cumberland, West Virginia.

Report **reiterates a recommendation that OSHA promulgate a general industry combustible dust standard**, something the agency has been calling for since 2006.





2014 – <u>OSHA Cites Combustible Dust at West Hartford Stairs; \$60,000 Fine</u>. Source <u>www.woodworkingnetwork.com</u>

- OSHA says it found that employees were exposed to fire hazards from a dust collection system that lacked a spark detector to prevent hot metal from entering the dust collector and igniting an explosion.
- Other hazards cited were (but not limited too) combustible dust in electrical outlets.





2016 – Viking Cabinets, Inc. fined \$107,000 for hazards including combustible dust Source: Woodworking Network

 ...following an inspection by the state labor department, found combustible fine wood dust had accumulated on the electrical system and other surfaces in the shop, creating an additional fire hazard.





2016 – <u>NY manufacturer fails to correct comdust hazard, allows recurring fire,</u> <u>explosion...faces \$197K in OSHA fines</u> Source <u>OSHA</u>

Agency inspectors found company failed to address combustible dust hazards involving the dust collection system....also identified failure to: Address combustible dust related fire and explosion hazards for conveyor equipment and an inoperable spark detection/fire suppression system.

- Inspect fire extinguishers annually, and maintain them in fully charged and operable condition.
- Remove accumulations of combustible wood dust and shavings on rafters and other surfaces.
- Remove piles of wood dust and shavings on floors that create fire, slip, trip, and fall hazards.





2017 - <u>Unilin wood products explosion kills employee, sends another to ER</u>
Source: Woodworking Network
A big explosion rocked Unilin's wood product plant in Montgomery County,
North Carolina

2017 – Two Injured in Silo Explosion, Fire at Mill in Oregon

Source: Powder Bulk Solids

"The explosion was possible by the presence of wood dust, which may have added to the fuel load in the form of finely dispersed combustible particles."





#### China

Three deadly explosions:

- May 2011 Foxconn Apple factory, aluminum dust
- Dec 2011 another Apple supplier in Pegatron in Shanghai, aluminum dust
- August 2014 wheel hub polishing facility in Jiangsu, metal dust, 169 deaths, over 200 injured.

Sept 2015 - China's State Administration of Work Safety issues guidelines to prevent combustible dust explosions.

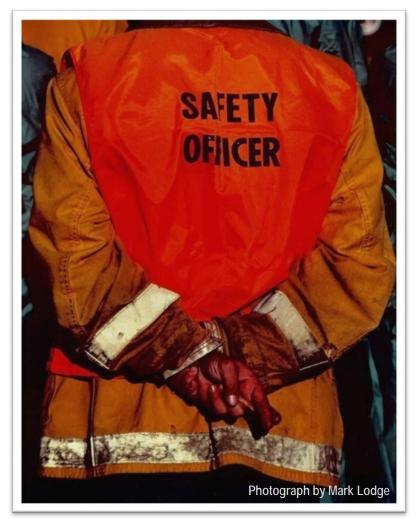
#### Taiwan

June 2015 - Corn Starch explosion, over 500 injured.

#### England

July 2015 – Wood Mill, Cheshire UK, 4 deaths, 35 injured







#### Use OSHA & NFPA as guidelines

- Hazard Recognition/Assessment
- Building Design & Engineering Controls
- Housekeeping
- Worker Training



Photo: U.S. Chemical Safety Board



#### CCOHS

(Canadian Centre for Occupational Health & Safety)

<u>Clearly defined prevention measures</u>

- Eliminate
- Substitute
- Engineering



- WORKING TO MAKE A DIFFERENCE
- Administration





#### Use OSHA & NFPA as guidelines

- Hazard Recognition/Assessment
- Building Design & Engineering Controls
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#### Hazard Recognition/Assessment

Assessment

- Dust Hazards Analysis (DHA) Example provided in NFPA 652 Standard on Combustible Dusts (Annex B)
- DHA, similar to a PHA (Process Hazard Analysis) is used to indentify hazard at each point along the process and to document how the hazard is managed
- DHA shall be completed with 3-year period from the effective date of this standard (Sept 7, 2015) NFPA 652-2016 7.1.2.2

**Insurance Company – Inspection** 

Check State and Local Codes

AHJ (Authority Having Jurisdiction) – Fire Marshall, Building Inspector.



#### **Building Design & Engineering Controls**

### Prevent/Eliminate accumulation of FUGITIVE dust, flat surfaces worst.

- Rectangular HVAC ducting.
- Overhead beams
- Electrical cable trays
- Lighting fixtures
- And "invisible" areas such as THOSE ABOVE suspended ceilings
- Round metal ducting Better option with less flat surface area.









#### Building Design & Engineering Controls

Equipment

 Abort Gates exhaust hazardous air flow from the ducting. Used in return air systems, Abort Gates safely exhaust hazardous air to the atmosphere, thereby protecting plant

and personnel.



Source: GreCon Spark Detection and "Explanatory Materials" Annex A NFPA 664



#### Building Design & Engineering Controls Equipment

<u>Explosion Protection VENTING Video</u>





#### Building Design & Engineering Controls Equipment

<u>Explosion Protection SUPPRESION Video</u>





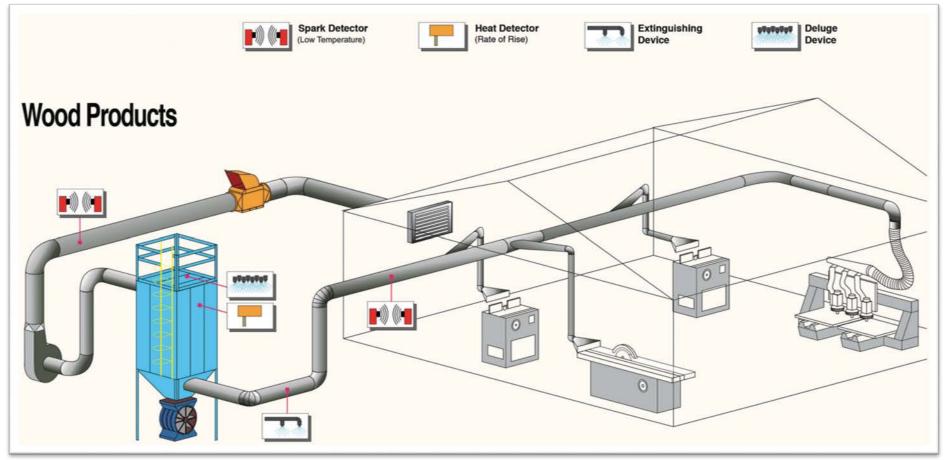
Building Design & Engineering Controls Equipment

- Spark Detection Information
- Spark detection systems are primarily used as a fire prevention method in dust collectors by detecting and extinguishing sparks and embers.
- A dull tool, a damaged fan bearing, an over heated motor, or a foreign object within the material can be the cause.
- <u>Spark Detection and Extinguishing video</u> simulation for dust collection.

Source: GreCon Spark Detection and "Explanatory Materials" Annex A NFPA 664



#### **Building Design & Engineering Controls**



For more information go to Informational Primer on Spark Detection and Extinguishing Systems – Annex C NFPA 664



Housekeeping – FUGITIVE Dust Control

If you can see dust, don't ignore it!



Photo: OSHA

- Underlying surface colors are NOT readily discernible, warrants immediate cleaning of area. Some guidelines: 1/32, 1/16, thickness of paperclip or dime.
- Clean it up and examine source. Seal openings to prevent the release of dust.
- Inspect workplace inspect and clean flat surfaces.
- Change/clean filters bags
- Use hanging air filters





#### Housekeeping – FUGITIVE Dust Control

For example per NFPA 664-2012 11.2.1.1

- "Surfaces shall be cleaned in a manner that minimizes the generation of dust clouds. Blowing down with compressed air or even vigorous sweeping shall be permitted only if the following requirements are met:
  - The floor area and equipment shall be vacuumed prior to blowdown.
  - Electrical power and other sources of ignition shall be shut down, removed from the area...per NFPA 70, National Electrical Code.



Photo: OSHA



Housekeeping – FUGITIVE Dust Control

For example per NFPA 664-2012 11.2.1.1 (con't)

- Only a low gauge pressure 15 PSI steam or compressed air shall be used
- No open flames, sparks from spark-producing equipment, or hot surfaces
- All fire protection equipment shall be in service.
- Explosion proof vacuum or fixed pipe suction system shall be used per NFPA.



Worker Training

"Safe work habits are developed and do not occur naturally." per NFPA 652 (A.8.4.2.1)

- Do the workers know what to do?
- Have they read the operating procedures?
- Do they understand?
- Have they been tested?
- Have you documented worker training?





## **Conclusion – What we discussed:**

What is Combustible Dust?



Who's in Charge?



Can it Happen in Your Facility?

Prevention







### **Top Three Follow-Ups**

- 1. Act on Testing
- 2. Implement Housekeeping
- 3. Investigate/Track OSHA and NFPA 652

Most importantly

be prepared to avoid an INSPECTION

or much worse an EXPLOSION.



#### Summary

#### While there is NO specific Combustible Dust REGULATION there is plenty to be concerned about:



Photo: U.S. Chemical Safety Board



OSHA U.S. Congress NFPA AHJ Insurance Co. and more.







#### Resources

#### **FM Global Insurance Company**

 Loss Prevention Data Sheet 7-76, Prevention and Mitigation of Combustible Dust Explosions and Fires

#### **NFPA – National Fire Protection Association**

- NFPA 654 Standard for the Prevention of Fire and Dust Explosions from the Manufacturing, Processing, and Handling of Combustible Particulate Solids
- <u>NFPA 664 Standard for the Prevention of Fires and Explosions in Wood</u>
   <u>Processing and Woodworking Facilities</u>
- NFPA 652 Standard on Combustible Dusts

#### **OSHA – Occupational Safety & Health Administration**

- <u>Combustible Dust</u>
- **U.S Chemical Safety Board** 
  - Combustible Dust
- **My Dust Explosion Research** 
  - My Dust Explosion Research



#### **THANK YOU**

Contact Information Jamison Scott Executive Vice President Air Handling Systems



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https://www.airhand.com/combustible-dust/

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