

Development Services

From Concept to Construction

Phone: 503-823-7300 Email: bds@portlandoregon.gov 1900 SW 4th Ave, Portland, OR 97201

More Contact Info (<http://www.portlandoregon.gov/bds/article/519984>)



APPEAL SUMMARY

Status: Decision Rendered - Reconsideration of ID 25035

Appeal ID: 26447	Project Address: 3905 SE 91st Ave
Hearing Date: 1/26/22	Appellant Name: Nicholas Sukkau
Case No.: B-006	Appellant Phone: (503) 916-3195
Appeal Type: Building	Plans Examiner/Inspector: John Cooley, Joe Thornton
Project Type: commercial	Stories: 1 Occupancy: E Construction Type: V-B
Building/Business Name: Marshall HS New CTE Building	Fire Sprinklers: Yes - throughout
Appeal Involves: Erection of a new structure, Reconsideration of appeal, other: 2nd reconsideration	LUR or Permit Application No.: 20-210264-CO
Plan Submitted Option: pdf [File 1] [File 2] [File 3] [File 4] Proposed use: high school	

APPEAL INFORMATION SHEET

Appeal item 1

Code Section	2020 NFPA 664
Requires	<p>2020 NFPA 664 is referenced by 2019 OSSC 426 Combustible Dusts and by 2016 City of Portland Fire Code, Chapter 22 Combustible Dust Producing Operations, Table 2204.1 Explosion Protection Standards.</p> <p>2020 NFPA 664 9.3.4</p> <p>Enclosureless dust collectors may only be located indoors if all of the following criteria are met:</p> <ul style="list-style-type: none">-The collector is located at least 6.1 m (20 ft) from any means of egress or area routinely occupied by personnel.-Multiple collectors in the same room are separated from each other by at least 6.1 m (20 ft) <p>Per discussion with Fire Marshall Joe Thornton, this appeal is being submitted as a building code appeal rather than a fire code appeal.</p>
Code Modification or Alternate Requested	The intent is to allow for temporary use of portable enclosureless dust collectors in lieu of the "enclosed" portable dust collectors approved under the current permit.
Proposed Design	For a period of no more than 90 days from occupancy, the facility will utilize portable enclosureless dust collectors (Jet model DC-1100VX-CK). Dust collectors will be attached and in use while dust producing equipment is operational. Dust Collector locations will be per the attached plans, with a total of (6) in room D-7 Construction, (2) in room D-13 Tech Geometry, and (1) in room D-9 CNC. Although the code-required spacing cannot be achieved in all areas, the collectors will be fairly well spaced out. The Dust Collectors will be stationary for the duration of their use as the dust collection system.

RECONSIDERATION TEXT: An analysis of dust hazard issues has been provided, as requested - see attached. The recommendations of this analysis will be adopted in operating the temporary dust collectors.

RECONSIDERATION 2 TEXT: This second reconsideration is submitted as a request for a time extension only. Instead of using portable dust collectors for 90 days as originally proposed above, a period of 180 days is now proposed.

Reason for alternative A central dust collection system is now being pursued for the CTE Annex building instead of the portable dust collectors. Due to availability of materials and shift in design direction through consultation with the City of Portland and the District, the system will not be operational by the date that school begins in the fall. Once the central dust collection system is installed and operational, use of the proposed temporary portable dust collectors will cease permanently. As part of the required housekeeping plan necessary for the completion of the project's Dust Hazard Analysis, direction will be included specifically for the use of the proposed temporary Dust Collectors, including but not limited to frequent housekeeping to prevent dust accumulations from reaching hazardous levels, maintenance of equipment in accordance with OEM recommendations, and other requirements as outlined in the Dust Hazard Analysis.

RECONSIDERATION TEXT: An analysis of dust hazard issues has been provided, as requested - see attached. The recommendations of this analysis will be adopted in operating the temporary dust collectors.

RECONSIDERATION 2 TEXT: This second reconsideration is submitted as a request for a time extension only. Instead of using portable dust collectors for 90 days as originally proposed above, a period of 180 days is now proposed. The COVID pandemic has presented many challenges to completing the permanent central dust collection system, including supply chain problems, extended equipment lead times and material and labor shortages. In addition, some of the project subcontractors have experienced COVID outbreaks which have slowed their progress. At this point, the central dust collection system permit revision has been approved by the City, so progress towards completion is being made. However, the system will not be completed within the 90 day duration, so an extension to 180 days duration is proposed.

APPEAL DECISION

Ninety day extension of granted appeal #25035 to allow temporary use of portable dust collectors: Granted provided use is limited to no more than 180 days from occupancy.

Note: The District Fire inspector shall have the authority to summarily void this approval if any of the appeal provisions are violated.

Appellant may contact John Butler (503 865-6427) or e-mail at John.Butler@portlandoregon.gov with questions.

The Administrative Appeal Board finds with the conditions noted, that the information submitted by the appellant demonstrates that the approved modifications or alternate methods are consistent with the intent of the code; do not lessen health, safety, accessibility, life, fire safety or structural requirements; and that special conditions unique to this project make strict application of those code sections impractical.

Pursuant to City Code Chapter 24.10, you may appeal this decision to the Building Code Board of Appeal within 90 calendar days of the date this decision is published. For information on the appeals process, go to www.portlandoregon.gov/bds/appealsinfo, call (503) 823-7300 or come in to the Development Services Center.

OVERALL BUILDING PLAN FOR REFERENCE

bassetti
architects

721 NW 9th Ave, Suite #350
Portland, OR 97209
T (503) 224 9162 F (206) 340 9519

d

deca
architecture inc

935 SE Alder Street : Portland Oregon 97214
tel 503 239 1987

ARCHITECT OF RECORD

DECA Architecture, Inc.
935 SE Alder Street
Portland, OR
T (503) 239 1987

CIVIL

Mazzetti BHE Group
121 SW Salmon Street, Suite #1000
Portland, OR 97204
T (503) 620 3232

STRUCTURAL ENGINEER

ABHT

1640 NW Johnson
Portland, OR 97209
T (503) 243 6662

MECHANICAL/ PLUMBING ENGINEER

SYSTEMS DESIGN CONSULTANTS
333 SE 2nd Ave
Portland, OR 97214
T (503) 248 0227

ELECTRICAL, TECH & SECURITY

REYES ENGINEERING
321 NE Couch Street #403
Portland, OR 97232
T (503) 771 1986

COST ESTIMATING

Construction Focus
740 Almaden Street
Eugene, OR 97402
T (541) 686 2031

ACOUSTICAL/ AUDIOVISUAL

Greenbusch
1903 W Nickerson Street, Suite #201
Seattle, WA 98119
T (206) 378 0569

ENVIRONMENTAL

PBS

4412 SW Corbett Ave
Portland, OR 97239
T (503) 248 1939

DOOR HARDWARE

Adams Consulting & Estimating, LLC
2337 N. 57th Street
Seattle, WA 98103
T (206) 528 0244

ONE INCH
AT FULL SIZE

5	AS102	05/04/21
4	AS101	02/02/21
3	Addendum #4	01/28/21
2	Addendum #1	01/05/21
1	permit rev 1	11/30/20

#	REVISIONS	DATE
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PORTLAND PUBLIC SCHOOLS

BENSON
MARSHALL
SWING SITE
NEW BUILDING

3905 SE 91ST AVE
PORTLAND, OREGON 97266

JOB NO: 1909

ISSUE DATE: 10 / 20 / 2020

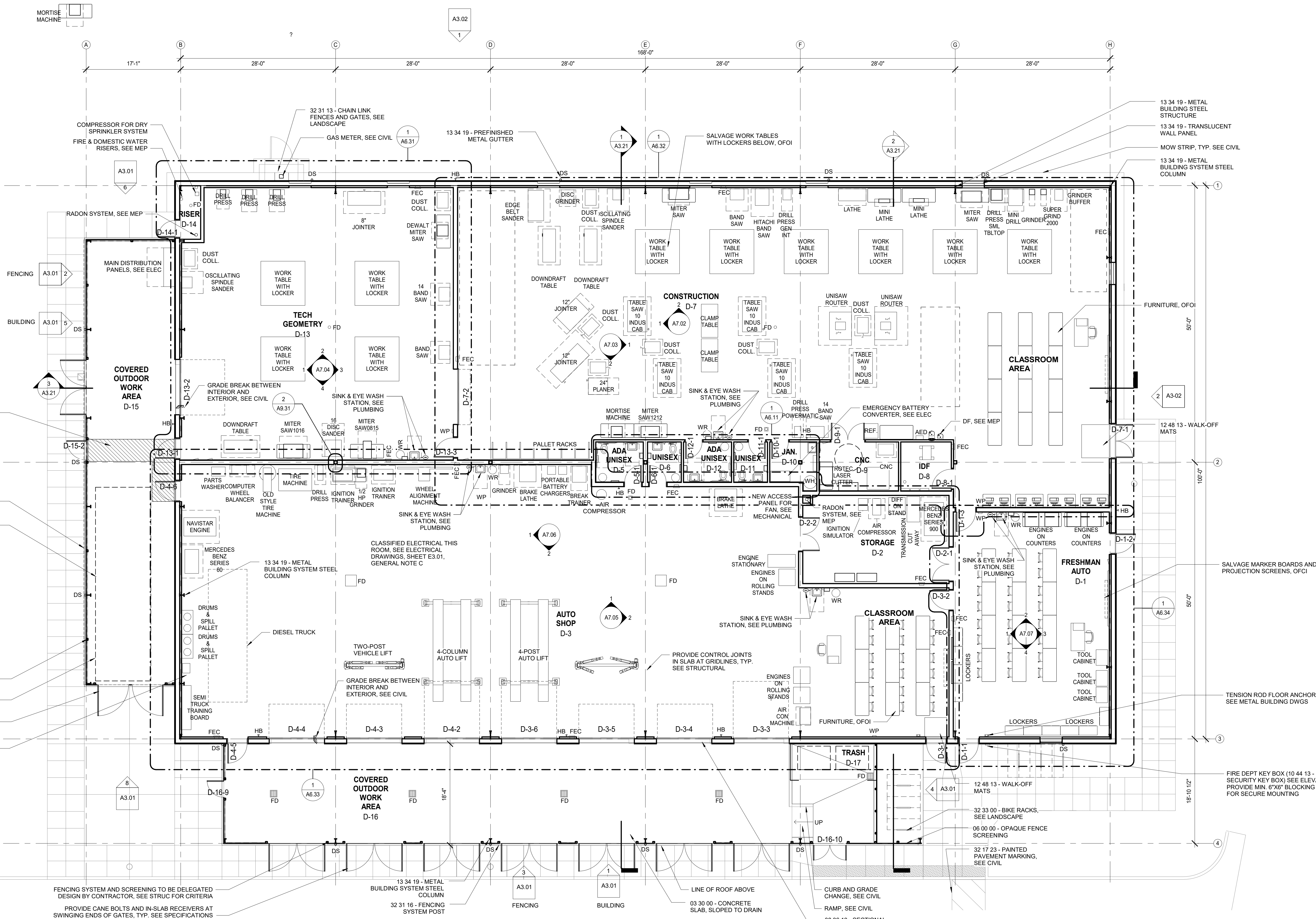
Jurisdiction Stamp Area



FLOOR PLAN

PERMIT

A2.01



FLOOR PLAN NOTES

- ALL NEW WALLS TO EXTEND TO STRUCTURE ABOVE. UNO. SEE WALL TYPE INDICATIONS FOR LOCATIONS OF PARTIAL HEIGHT WALLS.
- EXTERIOR WALLS TO BE TYPE AA, UNO.
- INTERIOR WALLS TO BE TYPE A30, UNO.
- DO NOT SCALE DRAWINGS. COORDINATE DIMENSIONS SHOWN ON DRAWINGS WITH ACTUAL FIELD MEASUREMENTS. NOTIFY ARCHITECT OF DISCREPANCIES.
- REFERENCE METAL BUILDING DRAWINGS FOR LOCATIONS OF PRIMARY AND SECONDARY STRUCTURAL STEEL ELEMENTS, INCLUDING COLUMNS, BASE PLATES, BEAMS, GIRTS, ETC.
- ALL DIMENSIONS ARE TO FACE OF STUD, FACE OF CONCRETE, OUTER EDGE OF METAL BUILDING BENTS, CENTERLINE OF OPENING, CENTERLINE OF COLUMNS, AND CENTER LINE OF FIXTURES, UNO.
- PROVIDE PENETRATION FIRESTOPPING AT ALL ITEMS PASSING THROUGH FIRE RATED WALLS, TYP.
- ROUTE UTILITIES IN CONCEALED SPACES WHERE POSSIBLE. WHERE NOT POSSIBLE, USE SURFACE MOUNTED RACEWAYS LOCATED 8" AFF OR HIGHER.

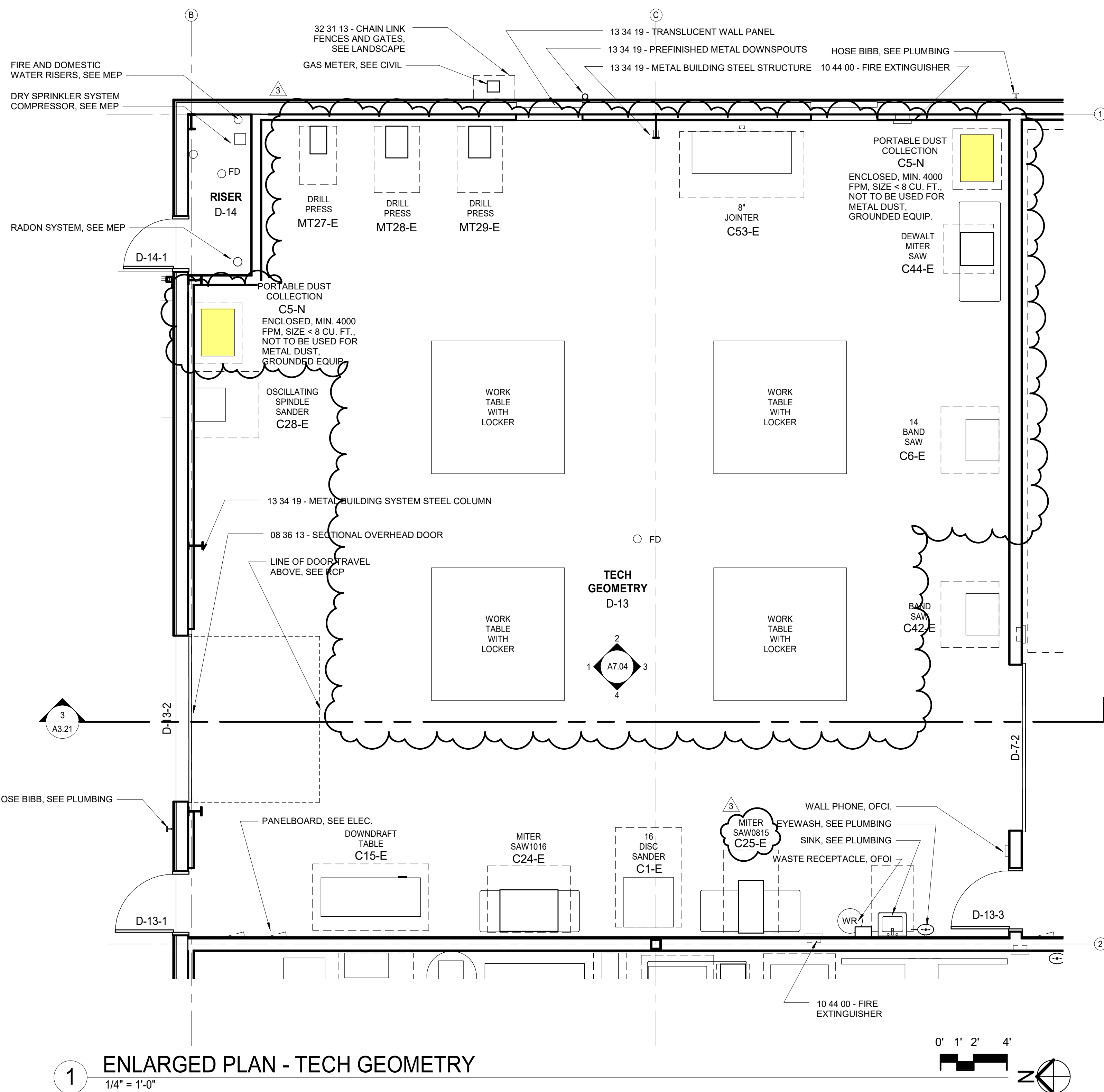
MARSHALL NEW BUILDING - FLOOR PLAN

1/8" = 1'-0"

- EQUIPMENT IS OFCI. UNO. OWNER'S MOVER WILL DELIVER EQUIPMENT TO THE SITE AND SET IN PLACE. CONTRACTOR WILL INSTALL MEP CONNECTIONS AND SECURE TO STRUCTURE.
- PROVIDE BACKING AND BLOCKING IN FRAMED WALLS WHERE REQUIRED TO SUPPORT WALL MOUNTED ITEMS. BACKING FOR WALL MOUNTED SINKS TO BE MINIMUM 1/4" STEEL PLATE DRILLED AND TAPPED FOR WALL CARRIER. BLOCKING AND BACKING FOR OTHER ITEMS TO BE MINIMUM 1" FIR PLYWOOD. LIGHT GAUGE BACKING NOT ACCEPTABLE FOR ANY ITEMS.
- AT METAL BUILDING WALLS AND ROOF. PROVIDE BACKING MEMBERS FOR ALL WALL AND ROOF MOUNTED ITEMS REQUIRING THEM. COMPLY WITH METAL BUILDING LOADING REQUIREMENTS. REFERENCE METAL BUILDING DRAWINGS FOR SECONDARY FRAMING LOCATIONS.
- AT FULL HEIGHT WALL HEADS, SEE DETAIL 16/A9.31. AT FIRE-RATED WALL HEADS, SEE DETAIL 17/A9.31.
- THERE SHALL NOT BE ANY METAL WELDING (GAS, MIG, TIG, STICK, ETC) OR METAL CUTTING (LASERS, TORCHES, ETC) OTHER THAN THE LASER REFERENCED IN THE DUST HAZARD ANALYSIS.
- PROVIDE CORNER GUARDS AT OUTSIDE WALL CORNERS. SEE INTERIOR ELEVATIONS FOR LOCATIONS.
- ALL EQUIPMENT DUST COLLECTION TO BE ACHIEVED VIA PORTABLE DUST COLLECTORS. NO PERMANENT DUST COLLECTION SYSTEM PROPOSED.

- LIMITED PORTABLE MOTOR VEHICLE BATTERY CHARGERS WILL BE USED, GENERALLY NO MORE THAN ONE CHARGER WILL BE IN USE AT A TIME.
- PORTABLE FIRE EXTINGUISHERS SHALL BE LOCATED IN CONSPICUOUS LOCATIONS ALONG NORMAL PATHS OF TRAVEL. MAXIMUM DISTANCE OF TRAVEL TO EXTINGUISHERS SHALL NOT EXCEED 50 FEET. EXTINGUISHER TYPE: 4-A:80-B:C, 10 LB.
- PROVIDE RADON SYSTEM BELOW SLAB WITH OPEN GRADED FILL TO PERMIT CIRCULATION OF GASES. SEE MECH DWGS AND DETAIL 26/A5.31.
- PROVIDE J-BOX EXTENSIONS OR OTHER ALIGNMENT MEANS AS REQUIRED FOR MOUNTING DEVICES OR OTHER ITEMS ON SCHEDULED WALL PANELS.
- CLASSIFIED ELECTRICAL IS NOT PROPOSED FOR THE WOOD WORKING AREAS AS NO COMBUSTIBLE DUST ATMOSPHERE WILL EXIST DUE TO HOUSEKEEPING, TRAINING AND OTHER MITIGATING MEASURES AS REFERENCED IN THE DUST HAZARD ANALYSIS.
- PROPOSED CHANGES IN THIS REVISION TO COMBUSTIBLE DUST GENERATING EQUIPMENT AND ANY DUST COLLECTORS (PORTABLE OR OTHERWISE) SHALL BE CONSISTENT WITH THE DUST HAZARD ANALYSIS BY FAUSKE & ASSOCIATES AND APPROVED BY BASSETTI ARCHITECTS ON MARCH 1, 2021, FOR THE ORIGINAL PERMIT DRAWINGS.

6/28/2021 2:24:32 PM



EQUIPMENT SCHEDULE

ID tag	Name	Manufacturer	Model #	Qty	Weight	Size	Working Size	Anchorage Data	Volts	Phase	Amps	HP	Elec Conn	UL List	Lighting	Comp Station	Compressed Air	Fume Exhaust Req	Dust Coll. (Y/N)	Dust Coll. Conn	Dust Coll. Notes	Material	Furnish/Install	Comments
C5-N	Portable Dust Collector	Diverseair	MAXFLO-PG-4000	4	445	47 1/2" x 29 1/2" x 41 1/2"	48 x 72	4 bolts, 3/8" holes, 1 on either side, 21" apart	120	1	60	1.5							Yes			Wood	OFCI	PAE 11/6/21: Duplicate tag as per prior in tech geo but different model number, can we assign new tag for one of them for tracking? different qty of ports, etc. BA 1/23/21 - yes this should be re-urged to C53-E going to be one containing the tag
C15-E	Downdraft Table	Genray Downdraft Tables Barbo	DET2	2		28 x 72	36 x 48	2 total holes, 3/8" holes, 1 on either side, 21" apart	115	3	20/10								Yes (Range of Use)			Wood	OFCI	
C24-E	Miter Saw	Makita	LS1016	1		30 x 42	48 x 80	tabletop	120	1	15								Yes	1 1/2"		Wood	OFCI	
C28-E	Oscillating Spindle Sander	JET	JS3015	1		18 x 38	40 x 80	tabletop	120	1	15								Yes	1 1/2"		Wood	OFCI	
C24-E	Miter Saw	DeWalt	JWBS-10	1		24 x 24	48 x 80	tabletop	120	1	15								Yes	1 1/2"		Wood	OFCI	
C44-E	DeWalt miter saw	deWalt	JWBS-10	1		34 x 24	48 x 48	1 bolts, 3/8" holes, 15.9" x 24.9" tabletop	120	1	15								Yes	1 1/2"		Wood	OFCI	
C53-E	8" Jointer	Powomatic	6080 B	1		30 x 72	48 x 84	2 total holes, 3/8" holes, 1 on either side, 21" apart	230	3	8.4	3							Yes	4"		Wood	OFCI	PAE 11/6/21: Duplicate tag as per prior in tech geo but different model number, can we assign new tag for one of them for tracking? different qty of ports, etc. BA 1/23/21 - yes this should be re-urged to C53-E going to be one containing the tag
MT27-E	Drill Press	General International		1		20x12x65			110/220	1	12/8	3/4							No					
MT28-E	Drill Press	Delta International	65-022	1		22x16x71			115/230	3	10.4/5.2	3/4							No					
MT29-E	Drill Press	Delta International	65-022	1		22x16x69			115/230	3	10.4/5.2	3/4							No					
	Work Tables w/ Lockers			6				Anchor work tables to floor with (4) 1/2" dia x 4" anchors per table	120 power taps								Yes							

EQUIPMENT SCHEDULE NOTES

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- ANCHOR EACH PIECE OF EQUIPMENT TO FLOOR STRUCTURE WITH (4) BOLTS, UNO. BOLTING IS DELEGATED DESIGN, BY CONTRACTOR
- VERIFY ALL EQUIPMENT REQUIREMENTS WITH OWNER
- CONTRACTOR TO PROVIDE ANY BLOCKING OR BACKING REQUIRED IN WALL FOR EQUIPMENT INSTALLATION, SEE SCHEDULE
- CONTRACTOR TO PROVIDE ASSEMBLY, INSTALLATION, BLOCKING AND BOLTING FOR OFCI ITEMS INDICATED IN THE PLAN THAT ARE NOT SCHEDULED, SUCH AS TABLES, SHELVING, MARKER BOARDS AND OTHER ITEMS

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DC-1100VX-CK DUST COLLECTOR, 1.5HP 1PH 115/230V, 2-MICRON CANISTER KIT

708659K

The JET® DC-1100VX features the exclusive Vortex Cone™ which improves chip separation to prevent clogging of the filter, and increases packing efficiency of the collector bag. The high air velocity (CFM) stands up to any competitive specifications, and the industrial controls are designed for years of durable use. Collection bags have a snap ring for fast installation and removal. Casters offer maneuverability within the shop.

FEATURES

- Eliminates premature filter clogging for sustained performance
- High air velocity (CFM) design stands up to any competitive specifications
- Includes four casters for maneuverability and total portability
- Industrial controls designed for years of trouble-free use
- Permanently lubricated, totally enclosed, fan-cooled motors are rated for continuous-duty
- Quick-connect collection bags with elastic band for fast, easy installation and removal
- Single-stage design for economical and quiet operation
- Vortex Cone improves chip separation and collector bag packing efficiency



JET RED ASSURANCE 5-YEAR WARRANTY

JET warrants every product it sells. If one of our tools needs service or repair, one of our Authorized Service Centers located throughout the United States can give you quick service. In most cases, any of these JPW Industries Authorized Service Centers can authorize warranty repair, assist you in obtaining parts, or perform routine maintenance and major repair on your JET tools. For the name of an Authorized Service Center in your area call 1-800-274-6848.

STAND BEHIND YOUR WORK

550+ SERVICE CENTERS NATIONWIDE | INDUSTRY-LEADING WARRANTIES | EXPERT TECHNICAL SERVICE



DC-1100VX-CK DUST COLLECTOR, 1.5HP 1PH 115/230V, 2-MICRON CANISTER KIT

708659K

SPECIFICATIONS

Air Flow @ 4" (CFM)	1100
Style (Type)	Canister
Velocity @ 4" (FPM)	12,571
Static Pressure (Wc.)	10-1/2
Efficiency (Micron)	2
Bag Diameter (In.)	20
Collection Bag Capacity (Cu. Ft.)	5-3/10
Collection Bag Length (In.)	29
Sound Rating (Db.)	70 - 80
Impeller Material	Steel
Motor Power (HP)	1-1/2
1-Hose Connection Diameter (In.)	6
2-Hoses Connection Diameter (In.)	4
Prewired Voltage (V.)	115



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DC-1100VX-CK DUST COLLECTOR, 1.5HP 1PH 115/230V, 2-MICRON CANISTER KIT

708659K

FULL SERIES

STOCK NO	MODEL NO	AIR FLOW @ 4" (CFM)	STYLE (TYPE)	VELOCITY @ 4" (FPM)	NUMBER OF AIR INLETS	EFFICIENCY (MICRON)
708658K	DC-1100VX-5M	1100	Bag	12,571		5
708657K	DC-1100VX-BK	1100	Bag			30
708659K	DC-1100VX-CK	1100	Canister	12,571		2
710701K	DC-1200VX-BK1	1200	Bag	13,745		30
710703K	DC-1200VX-BK3	1200	Bag	13,745		30
710702K	DC-1200VX-CK1	1200	Canister			2
710704K	DC-1200VX-CK3	1200	Canister	13,745		2

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BENSON POLYTECHNIC HIGH SCHOOL MARSHALL SWING SITE PORTLAND PUBLIC SCHOOLS (PPS)

DUST HAZARD ANALYSIS
APPENDIX A – DUST COLLECTOR ANALYSIS AND RECOMMENDATIONS
REVISED AUGUST 2, 2021

This document has been digitally signed



08/02/2021 2:04:33 PM

This dust hazard analysis by Fauske & Associates, LLC has been reviewed for conformance with 2019 NFPA 652.

Recommendations by the authoring engineer of record affecting the design have been incorporated into the construction documents.

Operations and housekeeping requirements are the responsibility of the owner.

August 2, 2021

Mr. Matt Primovic
Architect
Bassetti Architects
721 NW 9th Ave, Suite 350
Portland, OR 97209

Dear Mr. Primovic:

We have reviewed and analyzed the specifications for the portable enclosureless dust collectors which are planned for usage for up to 90 days at the Benson Marshall Swing Site New Building for Portland Public Schools. The review included evaluation of the equipment specifications with respect to the requirements put forth in NFPA 664 for facilities working with wood dust.

The planned equipment satisfies some of the requirements specified by NFPA 664, however some of the requirements are not satisfied. The analysis in Appendix A identifies measures which can be taken to reduce the risk of a combustible dust deflagration or explosion where Portland Public Schools elects to use the enclosureless dust collectors. Some residual risk would remain once the recommendations are implemented.

Regards,



Casey Allen, Ph.D.
Senior Consulting Engineer

Reviewed by:

Ashok Ghose Dastidar, Ph.D., MBA
Fellow Engineer-Westinghouse Electric Company

Timothy Cullina, P.E.
Senior Process Safety Engineer

Appendix A – Dust Collector Analysis and Recommendations

1. Background

The Benson Marshall facility is comprised of three areas: the *Building Construction Room*, *Auto Shop Room*, and *Tech Geometry Room*. Dust production will primarily occur in the *Building Construction* and *Tech Geometry Room* in the form of sawdust at multiple tool locations.¹ The school has a long-term plan to manage and capture the dust produced at each tool through use of a centralized dust collector. Detailed specifications for the centralized dust collection system are still being established, but the system will be designed to comply with NFPA 664 requirements for woodworking facilities, and with all NFPA 68 and 69 requirements for explosion protection and isolation.

Due to delays in procuring and installing the centralized dust collection system, the school intends to use nine enclosureless, portable dust collectors for the first 90 days of operation in the facility. The units will be distributed in the facility according to the specifications in A2.01 overall building plan. Subsequent analysis in this appendix summarizes equipment specifications, evaluates compliance with NFPA 664 requirements, and provides recommendations for reducing the risk of a combustible dust deflagration or explosion.

2. Portable Dust Collector Specifications

Specifications for the portable dust collectors are:

Model: Jet DC-1100VX-CK

Type: Enclosureless (filter media not enclosed or in a container)

Filter Bag Capacity: 5.3 ft³ (additional unknown volume present in cartridge filter)

Volumetric Flow Rate: 1100 CFM

Flow Speed: 5600 feet per minute (single 6” hose), 6300 feet per minute (dual 4” hoses)

3. Dust Collector Analysis

a. Compliance with NFPA 664 Requirements

NFPA 664 specifies several requirements for enclosureless dust collectors. The planned dust collectors comply with some, but not all of the NFPA 664 requirements, which are summarized in the following table. Requirements which are satisfied are identified in the table. For requirements which are not satisfied, recommendations are provided for reducing the risk of a combustible dust explosion. Some residual explosion risk will still remain after implementing these recommendations.

¹ Limited amounts of metal dust production are expected to occur in the *Auto Shop Room*, but the dust load is expected to be minimal and will therefore be managed through regular housekeeping.

Requirement	Analysis / Recommendations
9.3.3.2.6.4 [...] use of enclosureless air material separators shall be limited to enclosureless air material separators that meet all of the following criteria:	
(1) The filtration is accomplished by passing dust-laden air through filter media, collecting the dust on the inside of the filter media, and allowing cleaned air to exit to the surrounding area.	Requirement satisfied by the planned dust collector.
(2) The filter media are not enclosed or in a container.	Requirement satisfied by the planned dust collector.
(3) There is no means to mechanically shake or pressure-pulse the filter media while the fan is on.	Requirement satisfied by dust collector design. Additional administrative controls and training should be specified so that students and personnel in the shop do not interact with, adjust or make contact with the dust collector while in operation. Intentional or unintentional contact with the dust collector could dislodge wood dust from the collector, increasing airborne concentrations inside the collector.
(4) The filter media are under positive pressure.	Requirement satisfied by the planned dust collector.
(5) Removal of the collected dust is not automatic, continuous, or mechanical.	Requirement satisfied by the planned dust collector.
9.3.4(7) [Dust collector may be located] Indoors for enclosureless dust collectors meeting all of the following criteria:	
(a) The collector is used only for dust pickup from wood processing machinery (i.e., no metal grinders and so forth).	Use enclosureless dust collectors exclusively for wood dust.
(b) The collector is not used on sanders, molders, or abrasive planers having mechanical material feeds through the machine.	<i>Do not use dust collectors with the stated equipment.</i>
(c) Each collector has a maximum air-handling capacity of 2.36 m ³ /sec (5000 CFM).	Requirement satisfied by the planned dust collector.
(d) The fan motor is of a totally-enclosed, fan-cooled design.	Requirement satisfied by the planned dust collector.

(e) The collected dust is removed daily or more frequently if necessary to ensure efficient operation.	<i>To minimize dust load, it is recommended to empty the dust collectors after each class period (bag and filter).</i>
(f) The collector is located at least 6.1 m (20 ft) from any means of egress or area routinely occupied by personnel.	The facility layout will not accommodate this requirement. <i>Follow other recommendations in this analysis to reduce risk of an explosion or deflagration. Maximize distance between dust collectors and means of egress and areas routinely occupied by personnel.</i>
(g) Multiple collectors in the same room are separated from each other by at least 6.1 m (20 ft).	The facility layout will not accommodate this requirement. <i>Follow other recommendations in this analysis to reduce risk of an explosion or deflagration. Maximize distance between the dust collectors.</i>

b. Additional Recommendations

In addition to the recommendations provided in section 3a, the following recommendations are provided to further reduce the risk of a combustible dust deflagration or explosion:

1. Follow all previous recommendations outlined in the Fauske & Associates, LLC letter to Bassetti Architects on March 2, 2021.
2. Monitor the area around the dust collector for fugitive dust build up and conduct housekeeping (per recommendations in March 2, 2021 letter) when dust layers approach 1/8". It is recommended to clean the woodworking equipment after each class period.
3. Do not service more than one piece of equipment with a given dust collector. This measure will reduce airborne concentrations of dust inside of the dust collector manifold and filter bag/cartridge.
4. Establish an administrative control to inspect for and remove all wood for tramp metal (e.g., screws, nails, staples) prior to processing on woodworking equipment. The presence of these foreign objects may lead to a spark that could ignite wood dust generated during processing.
5. Inspect the interiors of the dust collector hoses for accumulations of dust and clean where present. The inspection interval should be frequent initially (e.g., daily) and may be adjusted as appropriate based on documented findings.
6. Maintain equipment in accordance with OEM recommendations to reduce combustible dust hazards.