



for fire safety in
automotive
refinishing and
paint spraying
processes



Fire Protection
Association

LOSS PREVENTION RECOMMENDATIONS

The aim of the FPA series of Recommendations is to provide loss prevention guidance for industrial and commercial premises and systems. The series continues a long tradition of providing authoritative guidance on loss prevention issues started by the Fire Offices' Committee (FOC) of the British insurance industry more than a hundred years ago and builds upon earlier publications from the Loss Prevention Council and the Association of British Insurers.

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SCOPE

These recommendations concern the key aspects of property protection in automotive refinishing processes involving the application of paint and similar surface treatments using flammable or highly flammable liquids. Such processes involve mixing, spraying, drying, baking/curing and cleaning.

Electrostatic processes are excluded from this document, as are finishing processes performed in car manufacturers' premises.

Guidance is limited to ways in which the risks of fire and explosion initiation and spread may be reduced to a minimum.

Some liquids, vapours and dusts may be toxic or irritant and in these cases extra precautions to those given in these Recommendations may be necessary. For further information relating to life safety issues and fire safety regulations, the Health and Safety Executive or the local Fire Authority should be consulted.

SYNOPSIS

These recommendations outline effective management procedures for vehicle spraying operations in proprietary vehicle finishing units, combination spraying/baking units and when no proprietary unit is available. The storage, mixing and handling of paints and solvents is addressed and guidance given with regard to vehicle fuel tanks, LPG fuelled vehicles and the extinguishing of fires.

DEFINITIONS

Classification of hazardous areas
(BS EN 60079-10:2003) (ref. 1)

(This classification refers to areas in which open processes are carried out. Areas in which closed processes are undertaken should be subject to a risk assessment.)

Zone 0: An area in which an explosive gas atmosphere is present continuously or for long periods.

Such zones are uncommon, but include the interior of extract ductwork (where there may be gassing off from deposited solids, particularly just after switching off the fan on completion of work).

Zone 1: An area in which an explosive gas atmosphere is likely to occur in normal operation.

Such zones should include:

- (a) the interior of a spray booth; and
- (b) within 2m horizontally around any source of flammable vapour and vertically upwards from the floor to 1m above the source, over the whole 2m horizontal radius.

In zones where there are many vapour sources, it is recommended that the whole zone from floor level (or from the floor of pits where they are present) up to 1m above the highest source be designated Zone 1 to allow flexibility in rearranging plant and simplifying maintenance – this would include paint kitchens/mixing areas and paint shops containing several booths.

Zone 2: An area in which an explosive gas atmosphere is not likely to occur in normal operation and, if it does occur, is likely to do so only infrequently and will exist for a short period only.

- (a) a further horizontal zone extending 2m beyond the Zone 1 above, and from floor level up to the height of the Zone 1 or 3m minimum, and
- (b) store rooms containing sealed tins of paint (any store room containing open tins, or where containers are opened, should be Zone 1).

Explosive Limits

(BS EN 60079-10: 2003) (ref. 1)

Lower explosive limit (LEL): The concentration of flammable gas or vapour in air, below which the gas atmosphere is not explosive.

Upper explosive limit (UEL): The concentration of flammable gas or vapour in air, above which the gas atmosphere is not explosive.

Fire resistance

In this document, fire resistance refers to the material properties of both insulation and integrity.

Flammable liquid

A liquid etc as defined below for highly flammable liquid but with a flashpoint up to 55°C.

Highly flammable liquid

The definition of 'highly flammable liquid' in DSEAR 2002 (ref. 2) is as follows:

'Highly Flammable Liquid' means any liquid, liquid solution, emulsion or suspension, other than aqueous ammonia, liquefied flammable gas, and liquefied petroleum gas which:

- (a) when tested in accordance with Part A.9 of the Annex to the Directive has a flashpoint of less than 32°C; and
- (b) when tested at 50°C using the procedure referred to in Appendix B to the 'Approved requirements and test methods for the classification and packaging of dangerous goods for carriage' (ref. 3) with a heating time of 60 seconds supports combustion.

INTRODUCTION

The dusts and vapours which are evolved during automotive paint spraying processes and the flammable nature of the solid residues may present serious fire and explosion hazards. Deposits of material used in the processes may be susceptible to spontaneous heating. The hazards may be greater if the deposits are from different types of paints, particularly if several layers of deposits are allowed to build up over time.

Drying, baking and curing processes often involve the use of heaters and ovens, which present additional fire and explosion hazards.

Flammable liquids fall within the definition of a 'dangerous substance' as defined in the Dangerous Substances and Explosive Atmospheres Regulations 2002 (DSEAR) (ref. 2). Therefore, if flammable solvents or paints are used, this legislation will apply, and a suitable and sufficient assessment of the hazards associated with these materials has to be undertaken.

It is a legal requirement for employers to carry out an assessment of the risk from fire to their employees, visitors and other 'relevant persons' in compliance with the Regulatory Reform (Fire Safety) Order 2005 and the equivalent legislation in Scotland and Northern Ireland (refs 4 to 7). As a result, the 'responsible person' for fire safety in the premises for the purposes of the Order must make a suitable and sufficient assessment of the risks to which relevant persons are exposed, in order to identify the general fire precautions to ensure the safety of employees and non-employees in and about the premises.

The assessment must be reviewed if it is suspected that it is no longer valid or when changes have been made to the layout of the premises, the processes carried out, the amounts or types of hazardous substances present, or the number and character of the people who may be present. The insurers of the business will often be able to offer assistance with this process.

As fire safety legislation is only concerned with life safety issues, it is recommended that when the fire risk assessment process is carried out, consideration is also given to an assessment of the risks to the building, its contents and the continuing smooth running of business operations.

The fire risk assessment should thus identify plant that is essential to the business and may be unique or difficult to replace. Equipment of high intrinsic value should also be identified. An action plan should be prepared to reduce the risk of damage from fire to such equipment or installations, and a suitable contingency plan should be prepared. Further guidance on the preparation of such a plan can be found in *Business resilience. A guide to protecting your business and its people* (ref. 8).

Other legislation may impose additional requirements to the provisions contained within this document (see refs 9 and 10). Due regard should also be given to environmental protection, particularly the disposal of waste solvents and solid residues.

RECOMMENDATIONS

1. General

- 1.1 Wherever potentially hazardous materials are stored or used, a list of the substances present should be maintained, along with details of their quantities and locations, as required in the COSHH Regulations (ref. 10). These details should be readily available for use by the fire brigade.
- 1.2 The HSE guidance in booklet HS(G) 51 (ref. 11) suggests the use of the acronym VICES to help apply five basic principles which ensure that any flammable or highly flammable liquid is used and stored with appropriate care.

The acronym may be explained as follows:

V Ventilation (see section 2)

- Is there sufficient ventilation to keep the concentration of the liquid's vapour below its lower explosive limit?

I Ignition (see section 3)

- Have all possible ignition sources been removed?
- Is the electrical and heating equipment used in this area suited to the risk category?

C Containment (see section 4)

- Are the liquids stored in suitable containers?
- Is only the minimum quantity for the work period kept in the workplace?
- Is explosion relief provided?

E Exchange (see section 5)

- Can flammable substances be eliminated?
- Can the substance be replaced by a less flammable one?

S Separation (see section 6)

- Is the storage of liquids separated from other stored materials?
- Is the area where the liquids are used adequately separated from those used for other purposes?
- Are physical barriers (examples might be walls, doors, cabinets and bins) present as required?

- 1.3 Suitable staff training should be in place to ensure all personnel are aware of the hazards in the workplace, and apply VICES to ensure a safer working environment for all.

- 1.4 Additional guidance on the application of VICES to the storage and use of flammable liquids is set out in Recommendations RC 20: Parts 1 and 2 (refs 12 and 13).

2. Ventilation

- 2.1 Where an explosive atmosphere may occur, the workplace must be classified into zones based on the frequency and duration of the explosive atmosphere (see definitions) and the zones checked by a competent person.
- 2.2 Flammable vapours and paint overspray should be removed from the process area by means of adequate mechanical ventilation at low level, preferably having free discharge direct to the open air. Only clean air should be used to replenish air supplies and sufficient inlets should be provided at a high level. Inlets should be positioned so as to provide a cross flow.
- 2.3 Exhaust ducts should not have sharp bends or ledges and should preferably be taken directly to the open air through an external wall or the roof. Any ducts that pass through other parts of buildings should have a minimum fire resistance of 30 minutes.
- 2.4 The points of discharge of vapours should be sited well clear of both potential ignition sources and entry points to buildings. Controls on dust and vapour emissions may be required by the provisions of the various environmental protection statutes.
- 2.5 There should be a separate ventilation fan and duct for each booth. Motors should not be located within the ductwork.
- 2.6 Fans and ducts should be accessible for cleaning, with access hatches provided at ductwork bends. Cleaning should be carried out regularly, following an assessment of the build-up of deposits. The deposits will be readily combustible and care is necessary in removal and storage. Non-metallic scrapers should be used. The build-up of deposits in filters has been known to cause fires and thus filters should be regularly cleaned and/or replaced, as appropriate.

Deposits should be collected and disposed of in accordance with environmental regulations. See 'Waste Materials' (sections 6.12 to 6.16).
- 2.7 Fans should be started at least 2 minutes before the process commences and should continue for at least 5 minutes after the process has ceased.
 - 2.7.1 If an automatic timer is used, means of immediate shutdown should be provided for emergency use.
 - 2.7.2 An airflow or differential pressure switch which monitors the flow of air should be provided in the inlet or exhaust duct and maintained at the setting determined by the COSHH assessment. The switch should be interlocked with the electrical supply, if the unit is electrically heated, otherwise with the fuel supply to the burner and to an audible alarm. The interlock should have manual reset facilities.

2.7.3 In the case of processes carried out other than in proprietary vehicle finishing units, adequate ventilation should be provided by mechanical means to prevent concentrations of vapour or dust approaching the lower flammable limit. The degree of ventilation required will depend on the properties of the materials, the quantities used, the location of the work and the type of process in use. The ventilation will normally be designed taking into account the results of the COSHH assessment (see ref. 3). It is normally deemed sufficient if the vapour concentration does not exceed 25% of the lower explosive/flammable limit (LEL).

3. Ignition

3.1 All sources of ignition such as naked flames, hot surfaces and unprotected electrical equipment should be excluded. In particular, welding must not be undertaken in or in the immediate vicinity of the spraying facilities.

Heating

3.2 The spraying or storage area may be heated by the following:

3.2.1 A heating system providing ducted warm air or supplying hot water or steam to pipes and radiators. The system should incorporate a heat exchanger, so as to prevent flammable vapours from coming into contact with an ignition source.

Any furnace or heat exchanger should be segregated and located either outside the process area, or in the open, or in a separate building of brick or concrete construction with a self-closing door to each opening. Combustion products should be exhausted to the open, clear of windows or other openings.

Hot water or steam should circulate at a temperature not exceeding 120°C.

3.2.2 Electrical heaters of the low temperature flameproof type, certificated for the use. The temperature of the external surface of such heaters should not exceed 120°C and they should be located where they are unlikely to receive paint deposits from overspray etc.

3.2.3 Electric underfloor or ceiling heating with heating elements totally embedded in concrete.

Booth temperatures

3.3 Operating temperatures should be controlled by thermostats, interlocked with the heating source, to prevent the temperature rising above the design level.

3.4 The possibility of the temperature overshooting the set point should not be ignored, and thus the oven should be equipped with a separate high temperature limit control, of the non-self-resetting type.

3.5 Drying/curing times should be restricted by the use of automatic timing devices.

3.6 All combustion units should be fitted with flame failure devices.

3.7 Automatic fire safety valves should be fitted to shut off the fuel supply in the event of fire.

Electrical equipment

3.8 An assessment of the work areas and storage areas should be carried out, and appropriate 'zones' assigned (see ref. 1). Expert advice may need to be sought for this assessment. Certified explosion-protected electrical apparatus and cabling appropriate for the relevant zones should then be selected.

3.9 When flammable liquids or dusts are present, although control measures are taken to minimise their uncontrolled release as far as is reasonably practicable, there will always remain the possibility of an explosive/flammable atmosphere forming. In such 'hazardous areas' all sources of ignition, including those associated with electrical sparks or hot surfaces of electrical apparatus, should be excluded or protected. Hazardous areas are classified into zones as described in the definitions section above.

3.10 Should it be necessary to use electrical apparatus (including wiring) in hazardous areas, it is imperative that it is suitably explosion-protected, with the degree of protection selected according to its probability of being exposed to a flammable atmosphere.

Additional advice is contained in *Recommendations for the selection of electrical and non-electrical equipment for use in atmospheres containing flammable and explosive gases or vapours* (ref. 14).

3.11 All fixed containers, pipework, mixers and other equipment should be electrically bonded and earthed.

3.12 Flexible leads should be provided to bond portable or mobile containers during mixing, filling or discharging operations when static electricity is likely to be generated.

Smoking

3.13 Smoking must be prohibited in all external areas where flammable liquids are used or stored. Appropriate notices should be prominently displayed.

3.14 Where a smoking shelter is provided it must be:

- subject to a specific fire risk assessment;
- constructed of non-combustible materials;

- where practicable, sited at least 10m away from any building or structure (20m on a site where a timber-framed structure is being erected);
 - provided with suitable metal ashtrays and a separate metal waste bin with a fitted metal lid; and
 - provided with a suitable fire extinguisher.
- 3.15 The immediate area around the shelter, and the shelter itself, should be kept clear of combustible materials including wind-blown debris and vegetation.
- 3.16 Raised, slatted floors or decking should not be used, and concealed or semi-open spaces should be sealed to ensure combustible debris cannot accumulate beneath the shelter.
- 3.17 The use of combustible curtains, canopies and drapes to protect smokers from the elements must be avoided.
- 3.18 In no circumstances should the shelter be sited near:
- windows;
 - ventilation intakes or extracts;
 - entrances and exits from the premises;
 - hazardous materials;
 - waste storage containers (such as skips or bins); or
 - beneath a canopy or low slung eaves.
- 3.19 Areas where smoking is allowed, but no shelter is provided, must be free of combustible materials and equipped with fire fighting equipment, metal ashtrays and a separate metal waste bin with a fitted metal lid.
- 3.20 A 'no smoking' policy must be established in outside areas where fire hazards exist. Such areas may include refuse and storage areas containing combustible materials, flammable liquids (including refuelling supplies), gas cylinders, foam plastics, fibreboard and timber. 'NO SMOKING' notices must be displayed prominently in these areas.
- #### 4. Containment
- 4.1 Only the minimum quantity of paint and other flammable liquids should be present in the mixing room, and all containers should be kept closed whenever possible to reduce the amount of evaporation.
- 4.2 Dispensing drums should be fitted with self-closing taps and drip trays or containers. The use of hand-operated pumps is recommended.
- 4.3 The use of water-wash or water-backed booths is recommended for removing airborne residues and vapours.
- 4.4 Vehicle finishing units should be provided with explosion relief.
- 4.5 Explosion relief panels should be at least half the area of the smallest side of the enclosure and vented to a safe area.
- 4.6 While this explosion relief should be capable of relieving the effects of an explosion arising from the ignition of flammable vapours from the paint solvents and from any minor spillage of vehicle fuel during the baking cycle, it is not designed to safely ventilate an explosion resulting from a gross leakage of fuel (whether petrol, LPG or diesel oil). In order to prevent such an occurrence the HSE has published guidance (ref. 15).
- 4.6.1 Filler caps on all vehicles must be removed before they are heated in the unit, and flaps covering filler caps should be fully opened before the oven doors are closed and the heating cycle is started. Placing the removed filler cap on the dashboard of the vehicle will provide a simple visual check that this procedure has been followed.
- 4.6.2 Ensure that the fuel tank is reasonably empty (a quarter full or less) before the vehicle is put in the oven.
- 4.6.3 Check the integrity of the fuel lines, particularly at joints. (The fuel lines, if non-metallic, should be able to withstand the temperatures likely to be encountered in the spraying unit).
- 4.7 Vehicles which have had engines removed, leaving open-ended fuel pipes from fuel tanks in place, should not be treated in a vehicle finishing oven.
- #### 5. Exchange
- 5.1 At the outset, attention should always be given to eliminating flammable and highly flammable liquids from the workplace wherever possible. Serious consideration should be given to the need for the use of such liquids in the process and the possibility of replacing them with non-combustible liquids as alternatives – or at least with those having a flashpoint above 55°C. Many businesses have now successfully replaced solvent-based products with water-based finishes.
- #### 6. Separation
- 6.1 The process should, wherever possible, be carried out in a separate building away from other workshop areas, or a room or compartment exclusively reserved for such work and separated from the rest of the premises by walls, partitions, doors or ceilings (including glazing) providing at least 30-minutes fire resistance.
- Any glazing should be fixed and suitably sealed to confine vapours, mists, residues, dusts and deposits to the spray area.

- 6.2 Vehicle finishing units should be non-combustible, constructed of metal, and any glazing therein should be suitably fixed to provide at least 30-minutes' fire resistance. If any rubber moulding or gasket is used, the metal flanges should be of a design which will retain the glass if the moulding/gasket disintegrates in a fire.
- 6.3 The spraying enclosure should be of sufficient size wholly to accommodate the vehicle to be painted, and to provide adequate working space, while at the same time allowing unobstructed access to emergency exits.
- 6.4 Booths shall be provided with means of escape.
- 6.5 All doors to the spraying enclosure should be self-closing, and should be kept closed during the process.
- 6.6 Where openings in the walls are required for conveyors or similar to pass through, these should be kept as small as practical and be suitably protected.

Storage

- 6.7 In the United Kingdom, paints and solvents used come within the scope of the Petroleum (Consolidation) Act 1928 (ref. 9), the Dangerous Substances and Explosive Atmospheres Regulations 2002 (DSEAR) (ref. 2) and the Regulatory Reform (Fire Safety) Order 2005 (ref. 4). Storage of paints and solvents should therefore be made the subject of a suitable and sufficient fire risk assessment (see refs 2 and 4).
- 6.8 It will normally be necessary for a suitable store to be provided for all liquids, whether they are 'highly flammable' or 'flammable'. They should be kept in accordance with the *Recommendations for fire safety in the storage and use of highly flammable and flammable liquids* series of documents (refs 12 and 13).
- 6.9 The quantity of materials for immediate use should be kept to a minimum, and should in no case exceed the maximum quantity required for the operation of one shift.
- 6.10 Storage of highly flammable liquids should be minimised. Stored liquids should be kept inside a suitably marked safety locker or bin of approved design. At the end of the shift, or day, any unused full or partially used containers should be returned to the bulk store.
- 6.11 All drums and cans should be kept securely closed when not in use and, when empty, they should again be closed and removed from the building.

Waste materials

- 6.12 In order to comply with the various environmental regulations (refs 16 to 21), it will usually be necessary to account for all discharges of potentially

harmful materials and also to return wastes for suitable treatment. This generally results in a need to store wastes until such time as sufficient volume has been accumulated for economic handling.

- 6.13 Liquid waste materials will usually contain some proportion of highly flammable liquid, and thus the same precautions for waste as for clean materials should be taken, unless it can be positively demonstrated that there is no fire risk from the waste concerned.
- 6.14 Liquid waste materials will often be collected in 205 litre drums. These will need to be stored under the conditions specified in the Recommendations set out in refs 12 and 13.
- 6.15 There can be a significant risk of a build-up of static electricity when pouring flammable liquids into drums. A long-necked metal funnel should be used to prevent splash filling, and earth bonding between the drum, funnel and the vessel being emptied.
- 6.16 There is also a significant fire risk from the presence of 'empty' tins and used air extract filters containing large quantities of combustible deposits. All materials such as these should be kept in a suitable store (see refs 12 and 13). Cleaning rags soaked in thinners should be stored in metal receptacles with metal lids.

Mixing rooms and distribution systems

- 6.17 The mixing of paints and other surface finishings should be undertaken in a purpose built mixing room.
- 6.18 Piping that conveys flammable liquids from mixing rooms or similar areas should be:
 - constructed of steel or other material compatible with the hazard;
 - secured in position;
 - subject to a weekly visual inspection; and
 - suitably bonded and earthed.
- 6.19 Piping should not pass through fire compartments, kitchens or ducting.
- 6.20 Shut-off valves linked to raise an alarm should be provided where flexible tubing or hose is used.
- 6.21 The walls, ceiling and floor of a mixing room should be of at least 30-minutes' fire resistance, with a self-closing 30 minute fire-resisting door.
- 6.22 The floor should be sloped, or have sills formed across door openings, to retain any spilt or leaking liquids.

7. Housekeeping

- 7.1 In view of the flammable nature of solid residues of cellulose solutions, and in particular cellulose nitrate, strict attention should be paid to cleanliness when these are used.
- 7.2 All places in booths where dusts and dry deposits can accumulate should be cleaned at least once a week. Powders and dusts should be removed using a vacuum cleaner, not by brushing.
- 7.3 Cleaning utensils should not be made of aluminium, ferrous metals or other sparking materials. Highly flammable liquids should not be used for cleaning purposes.
- 7.4 To facilitate cleaning, suitable peelable coatings may be used to line the booth. (Polythene sheeting held in place with water or a detergent solution is not suitable for this purpose.)
- 7.5 Scrapings and sweepings from spray deposits should be placed immediately in metal receptacles with metal lids, wetted down and removed from the building at the end of each day.

Any oily waste, disposable overalls, and used cleaning cloths should be deposited in metal receptacles with metal lids and also be removed from the building at the end of each day.

- 7.6 Non-combustible absorbent material should be readily available to soak up spillages. After use it should be swept up, put in a metal receptacle with a metal lid and stored outside the building to await disposal in accordance with the supplier's recommendations.
- 7.7 In view of the risk of spontaneous ignition, enclosures used for cellulose finishes should not be used for vegetable oil paint (oil-based synthetics) and varnish processes unless the enclosures and ventilation ducting are thoroughly cleaned in accordance with the manufacturer's recommendations before each changeover.
- 7.8 There are a number of proprietary cleaning units available which provide for the safe, efficient and quick cleaning of spray guns and nozzles. It is recommended that such a unit be installed and used in accordance with manufacturer's instructions.
- 7.9 Combustible materials should be kept at least 1m away from the outside of mixing and spraying booths.
- 7.10 The roof of the booth should not be used for storage.

8. Maintenance

- 8.1 All equipment should be maintained in good order in accordance with the manufacturers' instructions.

- 8.2 Booths should be maintained on a regular basis, but at least every 6 months, as determined by an assessment. The maintenance, which should be carried out by a competent engineer, should include testing of the safety controls and inspection of the ducting. When necessary, the ductwork should be thoroughly cleaned throughout its length.
- 8.3 The roof filters should be inspected, cleaned or replaced at the time of the planned maintenance visits.
- 8.4 Extract filters should, as a minimum, be replaced monthly.
- 8.5 All maintenance or contractors' work should be carried out under a permit to work system. Special precautions are necessary when work may generate heat or sparks and strict safety procedures must be followed in respect of any work involving plant, or equipment, containing or used for the handling of hazardous materials. Further information is provided in the FPA publication *Recommendations for hot work* (ref. 22).

9. Vehicle fuel tanks

Fires involving petrol can result in significant property damage as well as serious burns and even fatalities. Petrol vapour is invisible and heavier than air and will disperse over considerable areas, collecting in pits, sumps and drains. In order to mitigate the risk of fire and injury, it is important that safe procedures are followed at all times (see also paragraphs 4.6 and 4.7).

- 9.1 If the fuel tank is to be drained, the emptying and subsequent refilling of the vehicle petrol tank should be carried out in a well-ventilated area, free from pits and from ignition sources such as smoking, electrical hand tools, welding sparks and heaters.
- 9.2 A proprietary fuel retriever should be used to drain tanks. This should be fitted with adapters to suit the type of vehicle, in accordance with the manufacturer's instructions.
- 9.3 If it is necessary to remove the vehicle fuel tank, this should only be done by a competent person.
- 9.4 After removal, all openings to the tank should immediately be sealed, and the tank placed in a suitable store.
- 9.5 Wherever possible, all work involving fuel tanks should be carried out in a safe position in the open air. Before commencing, other employees in the vicinity should be advised, so that they are aware of the hazardous operation taking place.
- 9.6 For vehicles designed or converted to run on LPG, suitable precautions should be taken. Fuel supplies should be isolated at the cylinder and all cylinders

removed from vehicles before they are put through the drying/baking process. Removed cylinders should be stored safely outside the building.

10. Fire protection

- 10.1 A suitable number of appropriate portable fire extinguishers, approved and certificated by an independent, third-party certification body, should be provided in accordance with BS 5306-8 and maintained in accordance with BS 5306-3 (refs 23 and 24).
- 10.2 Consideration should be given to installing a fixed firefighting system, such as sprinklers or suitable gaseous systems. This will be particularly relevant to very hazardous plant or processes that are critical to the wellbeing of the business. When installing a sprinkler system, the guidance set out in BS EN 12845 and the associated Technical Bulletins should be observed (ref. 25).
- 10.3 Sprinkler heads, dry powder or gas discharge nozzles and fusible links where installed in process areas should be protected from accumulation of paint spray deposits and consequent clogging, by means of paper coverings. These should be changed at least weekly.

11. Fire safety management

- 11.1 A scheme should be established and monitored for the training and periodic refresher training of people who are using or could be using potentially hazardous materials, in compliance with the Regulatory Reform (Fire Safety) Order 2005. The training should include an understanding of: fire hazards, fire safety precautions and action in the event of a fire.

12.1 General (Section 1)	Yes	No	N/A	Action required	Due date	Signature
12.1.1 Wherever potentially hazardous materials are stored or used, is a list of the substances present maintained, along with details of their quantities and locations, as required in the COSHH Regulations?						
12.1.2 Is suitable staff training in place to ensure all personnel are aware of the hazards in the workplace and apply VICES to ensure a safer working environment for all?						
12.2 Ventilation (Section 2)						
12.2.1 Has adequate mechanical ventilation been provided at low level where necessary, with discharge direct to the open air?						
12.2.2 Are exhaust ducts free of sharp bends or ledges and taken directly to the open air through an external wall or the roof?						
12.2.3 Are the points of discharge of vapours sited well clear of both potential ignition sources and entry points to buildings?						
12.2.4 Is there a separate ventilation fan and duct for each booth, with motors located outside the ductwork?						
12.2.5 Are fans and ducts accessible for cleaning, with access hatches provided at ductwork bends?						
12.2.6 Are fans started at least 2 minutes before the process commences and left to run for at least 5 minutes after the process has ceased?						
12.2.7 If an automatic timer is used, are means of immediate shutdown provided for emergency use?						
12.2.8 Is an airflow or differential pressure switch, which monitors the flow of air, provided in the inlet or exhaust duct and maintained at the setting determined by the COSHH assessment?						
12.2.9 In the case of processes carried out, other than in proprietary vehicle finishing units, is adequate ventilation provided by mechanical means to prevent concentrations of vapour or dust approaching the lower flammable limit of the materials in use?						

	Yes	No	N/A	Action required	Due date	Signature
12.3 Ignition (Section 3)						
12.3.1 Are all sources of ignition such as naked flames, hot surfaces and unprotected electrical equipment excluded from the spraying area?						
Heating						
12.3.2 Is there sufficient pre-purge to ensure that any accumulation of gas/oil vapour is diluted below the lower flammable limit?						
12.3.3 Is the spraying or storage area heated by an acceptable form of equipment? (see sections 3.2.1 to 3.2.3)						
Booth temperatures						
12.3.4 Are the operating temperatures controlled by thermostats, interlocked with the heating source, to prevent the temperature rising above the design level?						
12.3.5 Is the oven equipped with a separate high temperature limit control, of the non-self-resetting type?						
12.3.6 Are drying/curing times restricted by the use of automatic timing devices?						
12.3.7 Are all combustion units fitted with flame failure devices?						
12.3.8 Are automatic fire safety valves fitted to shut off the fuel supply in the event of fire?						
Electrical equipment						
12.3.9 Has an assessment of the work areas and storage areas been carried out, and appropriate hazard 'zones' assigned?						
12.3.10 Are all sources of ignition, including those associated with electrical sparks or hot surfaces of electrical apparatus, protected or excluded from hazard zones?						
12.3.11 Is electrical apparatus (including wiring) in hazardous areas suitably explosion-protected, with the degree of protection selected according to its probability of being exposed to a flammable atmosphere?						
12.3.12 Are all fixed containers, pipework, mixers and other equipment electrically bonded and earthed?						

	Yes	No	N/A	Action required	Due date	Signature
12.3.13 Are flexible leads provided to bond portable or mobile containers during mixing, filling or discharging operations when static electricity is likely to be generated?						
<i>Smoking</i>						
12.3.14 Is smoking prohibited inside the premises and in external areas where flammable liquids are used or stored, with appropriate signs displayed?						
12.3.15 If a smoking shelter has been provided has it been: <ul style="list-style-type: none"> • subject to a specific fire risk assessment; • constructed of non-combustible materials; • where practicable, sited at least 10m away from any building or structure (20m on a site where a timber framed structure is being erected); • provided with suitable metal ashtrays and a separate metal waste bin with a fitted metal lid; and • provided with a suitable fire extinguisher? 						
12.3.16 Is the immediate area around the shelter and the shelter itself kept clear of combustible materials including windblown debris and vegetation?						
12.3.17 Is there an absence of raised, slatted floors or decking with any concealed or semi-open spaces sealed to ensure combustible debris cannot accumulate beneath the shelter?						
12.3.18 Has the use of combustible curtains, canopies and drapes to protect smokers from the elements been avoided?						
12.3.19 Is the shelter sited away from: <ul style="list-style-type: none"> • windows; • ventilation intakes or extracts; • entrances and exits from the premises; • hazardous materials; • waste storage containers (such as skips or bins); • a canopy or low slung eaves? 						
12.3.20 Are areas where smoking is allowed but no shelter is provided free of combustible materials and equipped with firefighting equipment, metal ashtrays and a separate metal waste bin with a fitted metal lid?						
12.3.21 Is a 'no smoking' policy established in outside areas where fire hazards exist with 'NO SMOKING' notices displayed prominently?						

		Yes	No	N/A	Action required	Due date	Signature
12.4 Containment (Section 4)							
12.4.1	Is only the minimum quantity of paint and other flammable liquids present in the mixing room, with all containers kept closed whenever possible to reduce the amount of evaporation?						
12.4.2	Are dispensing drums fitted with self-closing taps and drip trays or containers?						
12.4.3	Are vehicle finishing units provided with suitable explosion relief?						
12.4.4	Are explosion relief panels at least half the area of the smallest side of the enclosure, and do they vent to a safe area?						
12.4.5	Are filler caps on vehicles removed before they are heated in the unit and flaps covering filler caps fully opened before the oven doors are closed and the heating cycle is started?						
12.4.6	Is a check made to ensure that the fuel tank is reasonably empty (a quarter full or less) before the vehicle is put in the oven?						
12.4.7	Is the integrity of the fuel lines checked, particularly at joints, before cars are put into the spray unit?						
12.4.8	Is there a prohibition on treating vehicles in the finishing oven if they have had their engines removed leaving open-ended fuel pipes from fuel tanks in place?						
12.5 Exchange (Section 5)							
12.5.1	Has attention been given to eliminating flammable and highly flammable liquids from the workplace wherever possible – or replacing them with those of a non-flammable nature (with a flashpoint of 55°C or higher)?						
12.6 Separation (Section 6)							
12.6.1	Is the process carried out in a separate building away from other workshop areas, or in a room or compartment exclusively reserved for such work (including proprietary vehicle finishing units) and separated from the rest of the premises by walls, partitions, doors or ceilings (including glazing) providing at least 30-minutes' fire resistance?						

	Yes	No	N/A	Action required	Due date	Signature
12.6.2 Is the spraying enclosure of sufficient size wholly to accommodate the vehicle to be painted, and to provide adequate working space, while at the same time allowing unobstructed access to emergency exits?						
12.6.3 Are booths provided with means of escape?						
12.6.4 Are all doors to the spraying enclosure self-closing, and kept closed during the process?						
12.6.5 Where openings in the walls are required for conveyors or similar to pass through, are these kept as small as practical and are they suitably protected?						
<i>Storage</i>						
12.6.6 Is the storage of paints and solvents made the subject of a fire risk assessment in accordance with DSEAR?						
12.6.7 Is a suitable store provided for all liquids, whether they are 'highly flammable' or 'flammable'?						
12.6.8 Is the quantity of materials for immediate use kept to a minimum and in no case allowed to exceed the maximum quantity required for the operation of one shift?						
12.6.9 Are all drums and cans kept securely closed when not in use and, when empty, kept closed and removed from the building?						
<i>Waste materials</i>						
12.6.10 Are the drums used to store liquid waste materials stored under the conditions specified in the appropriate Recommendations (refs 12 and 13)?						
12.6.11 Is a long-necked metal funnel used to prevent splash filling, and are there provisions for bonding and earthing the drums, funnels and vessels being emptied?						
12.6.12 Are materials such as 'empty' tins, and used air extract filters containing large quantities of combustible deposits, kept safely in a suitable store?						
<i>Mixing rooms and distribution systems</i>						
12.6.13 Is the mixing of paints and other surface finishings undertaken in a purpose-built mixing room?						

	Yes	No	N/A	Action required	Due date	Signature
12.6.14 Is piping that conveys flammable liquids from mixing rooms or similar areas constructed of steel or other material compatible with the hazard, secured in position subject to a weekly visual inspection, and suitably bonded and earthed?						
12.6.15 Is piping routed so as not to pass through fire compartments, kitchens or ducting?						
12.6.16 Are shut off valves linked to raise an alarm provided where flexible tubing or hose is used?						
12.6.17 Are the walls, ceiling and floor of a mixing room of at least 30 minutes' fire resistance, with a self-closing 30-minute fire-resisting door?						
12.6.18 Is the floor sloped, or have sills been formed across door openings, to retain any spilt or leaking liquids?						
12.7 Housekeeping (Section 7)						
12.7.1 In view of the flammable nature of solid residues of cellulose solutions, and in particular cellulose nitrate, is strict attention paid to cleanliness when these are used?						
12.7.2 Are all places in booths where dusts and dry deposits can accumulate cleaned at least once a week?						
12.7.3 Are cleaning utensils made of materials other than aluminium, ferrous metals or other sparking materials?						
12.7.4 To facilitate cleaning, are suitable peelable coatings used to line the booth?						
12.7.5 Are scrapings and sweepings from spray deposits placed immediately in metal receptacles with metal lids, wetted down and removed from the building at the end of each day?						
12.7.6 Is a non-combustible absorbent material readily available to soak up spillages?						
12.7.7 Is the use of vegetable oil paint (oil-based synthetics) and varnish processes avoided in enclosures normally used for cellulose finishes?						
12.7.8 Are proprietary cleaning units used which provide for the safe, efficient and quick cleaning of spray guns and nozzles?						
12.7.9 Are combustible materials kept at least 1m away from the outside of the booth?						

		Yes	No	N/A	Action required	Due date	Signature
12.7.10	Is the roof of the spray booth free from storage?						
12.8 Maintenance (Section 8)							
12.8.1	Is all equipment maintained in good order in accordance with the manufacturers' instructions?						
12.8.2	Are booths maintained on a regular basis, but at least every 6 months, as determined by an assessment?						
12.8.3	Are the roof filters inspected, cleaned or replaced at the time of the planned maintenance visits?						
12.8.4	Are extract filters replaced monthly?						
12.8.5	Is all maintenance or contractors' work carried out under a permit to work system?						
12.9 Vehicle fuel tanks (Section 9)							
12.9.1	If the fuel tank is to be drained, is the emptying and subsequent refilling of the vehicle petrol tank carried out in a well-ventilated area, free from pits and from ignition sources such as smoking, electrical hand tools, welding sparks and heaters?						
12.9.2	Is a proprietary fuel retriever used to drain fuel tanks, and is it fitted with adapters to suit the type of vehicle, in accordance with the manufacturer's instructions?						
12.9.3	If it is necessary to remove the vehicle fuel tank, is this only done by a competent person?						
12.9.4	After removal, are all openings to the tank sealed, and the tank placed in a suitable store?						
12.9.5	Wherever possible, is all work involving fuel tanks carried out in a safe position in the open air?						
12.9.6	For vehicles designed or converted to run on LPG, are suitable precautions taken to isolate the fuel supplies at the cylinders and remove all cylinders from the vehicles before they are put through the drying/baking process?						

	Yes	No	N/A	Action required	Due date	Signature
12.10 Fire protection (Section 10)						
12.10.1 Where hazardous materials are used or stored, are a suitable number of appropriate portable fire extinguishers provided, approved and certificated by an independent, third-party certification body? Are these extinguishers maintained in accordance with BS 5306-3?						
12.10.2 Has consideration been given to installing a fixed firefighting system, such as sprinklers or suitable gaseous systems?						
12.10.3 Where sprinkler heads, dry powder or gas discharge nozzles and fusible links are installed in process areas, are they protected from accumulation of paint spray deposits and consequent clogging, by means of paper coverings which are changed at least weekly?						
12.11 Fire safety management (Section 11)						
12.11.1 Has a scheme been established and monitored for the training and periodic refresher training of people who are using, or could be using, potentially hazardous materials, in compliance with the Regulatory Reform (Fire Safety) Order 2005?						

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25. *LPC Rules for automatic sprinkler installations incorporating BS EN 12845*, Fire Protection Association, 2003.

FURTHER READING

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2. Health and safety booklet, HS (G) 140: *Safe use and handling of flammable liquids*, Health and Safety Executive, 1996.
3. Health and safety booklet, HS (G) 67: *Health and safety in motor vehicle repair*, Health and Safety Executive, 1991.
4. Leaflet IND (G) 331: *Safe use of petrol in garages*, Health and Safety Executive, 2000.
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RC31

for fire safety in
automotive
refinishing and
paint spraying
processes

Recommendations



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