

# NFPA 33

## Spray Application Using Flammable or Combustible Materials

2007 Edition

**Reference: Chapters 4 through 8, Chapter 10**

**F.I. 85-3**

**Question 1:** Chapters 4 and 5 of NFPA 33 provide requirements for the design, location and construction of spray booths and spray rooms.

a) Will compliance with these requirements assure that a spray booth or spray room will provide adequate protection against health hazards from toxic materials?

**Answer:** No.

b) Will compliance with these requirements assure that a spray booth or spray room will meet the Clean Air Act standards for exhaust emissions?

**Answer:** No.

**Question 2:** In Chapter 6 of NFPA 33, certain areas within or adjacent to spray finishing areas are designated as hazardous locations, i.e., Class I or II, Division 1 or 2. Does this designation indicate the extent to which worker health hazards from toxic material may be present?

**Answer:** No.

**Question 3:** In Chapter 7 of NFPA 33, the concentration of flammable materials in a spray booth or room ventilation exhaust stream is required to be maintained below 25 percent of the LFL

a) Will compliance with these sections also assure that concentrations of toxic material will be kept at a safe level, i.e., below the Threshold Limit Values?

**Answer:** No.

b) Will the Standard allow for the concentration to be raised above 25 percent of the LFL in order to meet environmental compliance requirements limiting the amount of material that may be discharged from an exhaust stack?

**Answer:** No.

**Question 4:** Chapter 8 of NFPA 33 provides requirements for the storage and handling of flammable and combustible liquids necessary to prevent fire and explosion.

Will compliance with the Standard also assure that worker exposure to toxic materials will be kept at a safe level, i.e. - below the Threshold Limit Values?

**Answer:** No.

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**Question 5:** Chapter 10 of NFPA 33 provides requirements for maintenance in a spray area. These requirements include disposal techniques for overspray collectors; residue scrapings and rags or waste material; storage of contaminated clothing; and the prompt removal of contaminated materials and residues.

a) Will compliance with these requirements assure that all necessary steps have been taken to prevent worker exposure to harmful concentrations of toxic materials?

**Answer:** No.

b) Do the requirements include those steps needed to assure compliance with RCRA rules for hazardous waste disposal?

**Answer:** No.

**Issue Edition: 1985**

**Reference: Chapters 4 through 8, Chapter 10**

**Date: September 1987**

**Reissued to correct error: January 2002**

Formal Interpretation

# NFPA 33

## Spray Application Using Flammable or Combustible Materials

2007 Edition

**Reference: Chapter 9**

**F.I. No.: 33-95-2**

**Question No. 1:** Does Section 9.1 require some type of fire protection for spray areas, as defined in Chapter 3 of NFPA 33?

**Answer:** Yes.

**Question No. 2:** If the answer to Question No. 1 is “Yes”, does Section 9.1 specify the type of system that must be used?

**Answer:** No.

**Question No. 3:** If the building in which the spray application is located is not protected by automatic sprinklers, does Chapter 9 require that the spray area be protected by an automatic sprinkler system?

**Answer:** No.

**Question No. 4:** If the answer to Question No. 3 is “No”, does Chapter 9 allow an alternative fire protection system?

**Answer:** Yes.

**Issue Edition: 1995**

**Reference: Chapter 9**

**Issue Date: August 3, 1999**

**Effective Date: August 23, 1999**

**Reissued to correct error: January 2002**

Formal Interpretation

# NFPA 33

## Spray Application Using Flammable or Combustible Materials

2007 Edition

**Reference:** 9.1, Appendix A.9.1 through A.9.7

**F.I. 85-2**

**Question 1:** Does Section 9.1 of NFPA 33 mean that paint spray rooms or booths are required to be sprinklered or be equipped with another type fire extinguisher system where sprinkler protection is not available?

**Answer:** Yes.

**Question 2:** In Appendix A.9.1 through A.9.7 of NFPA 33, does the use of the word should instead of the word shall imply that fire extinguishing systems are not required in all paint spray rooms and booths?

**Answer:** No.

**Question 3:** Are manufactured, pre-fab(ricated) and portable paint spray booths, which are not equipped with built-in fire extinguishing systems, yet advertised as meeting UL, BOCA, NFPA, and OSHA standards, exempt from the requirements for sprinkler protection or an approved fire extinguishing system, as required by Section 9.1 of NFPA 33?

**Answer:** No.

**Question 4:** Do the requirements of NFPA 33, specifically (those of) sprinkler protection or an approved fire extinguishing system, apply to a paint spray room or booth that has been constructed outside and separated from the main body shop premises?

**Answer:** Yes.

**Issue Edition:** 1985

**Reference:** Chapter 9, Appendix A.9.1 through A.9.7

**Date:** May 1987

**Reissued to correct error:** January 2002