


BC BUILDING CODE INTERPRETATION COMMITTEE

A joint committee with members representing
AIBC, EGBC, BOABC

File No: 12-0134

INTERPRETATION

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Interpretation Date:	December 9, 2018
Building Code Edition:	BC Building Code 2012
Subject:	Paint Spray Booths
Keywords:	Paint Spray Booth, Major Occupancy
Building Code Reference(s):	Division A 1.4.1.2, Division C 3.2.2.8.(1), 3.3.1.2.(1), A-3.1.2.1.(1), BC Fire Code
Question:	
Is a suite or portion of a building containing a paint spray booth required to be classified as a Group F, Division 1 (high hazard industrial) major occupancy?	
Interpretation:	
No.	
Paint spray booths may be installed in various types of facilities such as metal fabrication shops, vehicle repair shops, or manufacturing facilities. For the purposes of this interpretation, it is assumed that paint spraying is not the main activity in the suite where the spray booth is located.	
Paint spraying may be done with flammable or combustible liquids, which may create a high fire hazard. Sentence 3.2.2.8.(1) states that a major occupancy whose aggregate area is not more than 10% of the floor area in which it is located need not be considered as a major occupancy for the purposes of Subsection 3.2.2, provided it is not classified as a Group F, Division 1 or 2 occupancy.	
Appendix reference A-3.1.2.1.(1) gives "Spray painting operations" as one of the examples of a Group F, Division 1 major occupancy classification. Division A, Article 1.4.1.2 includes the following definition: "Major occupancy means the principal occupancy for which a building or part thereof is used or intended to be used, and shall be deemed to include the subsidiary occupancies that are an integral part of the principal occupancy."	
	
Patrick Shek, P.Eng., CP, FEC, Committee Chair	

The views expressed are the consensus of the joint committee with members representing AIBC, EGBC and BOABC, which form the BC Building Code Interpretation Committee. The Building and Safety Standards Branch, Province of BC and the City of Vancouver participate in the committee's proceedings with respect to interpretations of the BC Building Code. The purpose of the committee is to encourage uniform province wide interpretation of the BC Building Code. These views should not be considered as the official interpretation of legislated requirements based on the BC Building Code, as final responsibility for an interpretation rests with the local *Authority Having Jurisdiction*. The views of the joint committee should not be construed as legal advice.

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In a typical facility such as a metal fabrication shop or a vehicle repair shop, the paint spray booth is not the “principal occupancy” of the facility. Therefore, the paint spray booth is not the major occupancy.

Sentence 3.3.1.2.(1) refers to Subsections 3.3.5 and 3.3.6, provincial regulations or municipal bylaws, and the BC Fire Code, with respect to the storage, handling and use of hazardous substances. Subsections 3.3.5 and 3.3.6 do not directly address paint spray booths. Subsection 5.4.6 of the BC Fire Code addresses spray coating processes involving combustible dry powders, flammable liquids or combustible liquids. BCFC 5.4.6.2.(1) requires that the design, operation and maintenance requirements for spray coating processes shall conform to NFPA 33 “Spray Application Using Flammable or Combustible Materials”.

It is interpreted that a paint spray booth in a facility where paint spraying is not the main use of the facility is a specific hazard required to be protected in accordance with NFPA 33, and the paint spray booth is not a major occupancy. Note that if paint spraying is the main activity of the suite or facility, a Group F, Division 1 occupancy classification would be appropriate.

This interpretation request was submitted under the BC Building Code 2012. The BC Building Code 2018 has now been issued. The applicable requirements in the Building Code and Fire Code have not meaningfully changed between the 2012 and 2018 editions and therefore this interpretation is also valid for the BC Building Code 2018.

Patrick Shek, P.Eng., CP, FEC, Committee Chair

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