

South Carolina Department of Labor, Licensing and Regulation
Division of Labor
Office of Occupational Safety and Health
Columbia, South Carolina 29211

OSH Program Directive Number 82-1910.37-2

Subject: Subarticle 6, Section 1910.37 (f) (2), Clarification of Type Doors in Storage Occupancies.

Standard: Subarticle 6, Section 1910.37 (f) (2), Rules and Regulations, Commissioner of Labor, State of South Carolina.

Cross Reference to Federal Standards: 29 CFR 1910.37 (f) (2).

Background: This directive clarifies when horizontal sliding doors or vertical roll-up doors are acceptable as exits in storage occupancies in lieu of being of the side-hinged, swinging type.

Interpretation: The latest edition of the Life Safety Code (NFPA 101-81) allows horizontal sliding doors or vertical roll-up doors to be used as acceptable exits in storage occupancies under the following conditions:

- a) One means of egress is provided for each 10,000 square feet, and the building is not occupied normally by more than ten persons and does not contain high hazard materials.
- b) Travel distance to that mean of egress in an unsprinklered building shall not exceed 50 feet and 100 feet in a building protected throughout by an approved automatic sprinkler system.
- c) All doors shall remain secured in the full open position during the period of occupancy.
- d) Every door shall be equipped with a readily visible, durable sign on or adjacent to the door stating “ THIS DOOR TO REMAIN UNLOCKED AND OPEN WHEN THE BUILDING IS OCCUPIED”. The sign shall be in letters not less than one inch high on a contrasting background.
- e) Doors shall not be brought to the closed position when the space is occupied.
- f) The locking device shall be of a type that is readily distinguishable as locked.

Definitions:

- a) Storage Occupancies – include all buildings or structures utilized primarily for storage or sheltering of goods, merchandise, products, vehicles, or animals. Included in this occupancy group are warehouses, cold storage, truck and marine terminals, bulk oil storage, barns and stables. Minor storage incidental to another occupancy is treated as part of the other occupancy.
- b) High hazard materials – includes gasoline and other flammable liquids which are handled, used or stored under conditions which might result in the release of flammable vapors; grain, wood floor, plastic, aluminum, magnesium, or other dust-generating materials which may produce explosions; hazardous chemicals or explosives where manufactured, stored or handled; cotton or other combustible fibers which are processed and handled under conditions which might produce combustible flyings sufficient to cause ignition; and other similar hazardous materials.
- c) See Subarticle 6, Section 1910.135 for other applicable definitions.

Effective Date: This instruction is effective upon receipt and will remain in effect until cancelled or superseded by amendment to the Rules and Regulations.

William M. Lybrand
May 14, 1982