



Texas Department of Insurance

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April 1, 2004

RECENTLY ASKED QUESTION

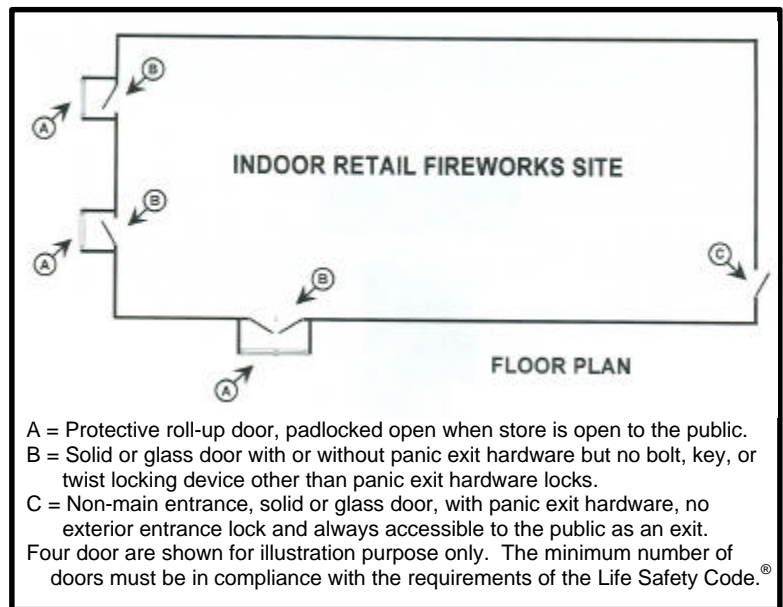
FWKS 001-2004 USE OF ROLL-UP DOORS FOR INDOOR FIREWORKS RETAIL SITES

on TDI website at: <http://www.tdi.state.tx.us/general/pdf/fmlifwks00104.pdf>

QUESTION: I have a retail fireworks site from which I sell 1.4G fireworks. Most of my entrance doors are made of glass. I am concerned that during or after the selling season a vandal may break the glass and/or enter the building. The best approach would probably be to change all the doors to solid doors. I understand that all the doors must have panic exit hardware. However instead of replacing the doors is it possible to put a solid metal roll-up door over the outside of the glass doors and close the roll-up doors at night when the premise is vacant or during the off-season?

OPINION: When the roll-up doors are closed, the ability to exit the building is impaired and would probably be in violation of the Life Safety Code® (LSC), NFPA 101®. The intent of the code is to provide fail-safe conditions such that a property owner does not have to remember to take certain action each day (i.e. unlock all the doors) to be in compliance with the code. However, if a facility is required to have only two exit doors, then roll-up doors, used for security purposes, may be considered subject to the following conditions:

1. **ALL** roll-up doors (i.e. "A" shown in the diagram) must be **locked** in the open position when the building is open to the public or occupied by individuals, such as employees, who may be unfamiliar with the path of exit. Otherwise it will be considered in violation of the LSC. The roll-up doors should be locked open to inhibit an arsonist from starting an interior fire and closing the doors to lock in the occupants.
2. At least one door (i.e. "C" shown in the diagram) must **not** have a roll-up door or otherwise be obstructed. It must 1) have panic exit hardware, 2) not be capable of entry (no key lock at all) from the outside, 3) accessible as an exit for the public at all times when the building is occupied.
3. The one door, "C" in item #2 above, must not be a main entrance. It is assumed that a person entering the building would enter by rolling up and locking one door ("A") to enter the building through door "B". Then at least one door "B" and door "C" would in all cases be open and accessible for emergency exit. However all other doors must be rolled up and locked according to note #1 above.



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Notice of Information

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