POLICY / STANDARD NUMBER 18

Assembly Occupancy Egress Locking Guidance

To: Holders of Alcoholic Licenses requiring Fire Department Approval for Certificate of Inspections

From: Fire Prevention Bureau

Re: Locking mechanisms on egress doors.

Inspections have noted a wide variety of locking methods used for egress doors. This document is being distributed to define what this department considers acceptable. We are adopting language and guidance from 780 CMR the State Building Code.

The following will outline what the Brockton Fire Department considers as acceptable locking mechanisms on egress doors in your facility.

Egress doors are doors with “EXIT” signs above the doors.

In the past we have noted the use of a “double key cylinder” and “slide bolts”. “Double key cylinders are allowed under certain conditions, but slide bolts are NOT ALLOWED in any case.

780 CMR the state Building code states in part egress from a building via a door must be per IBC 1008.1.9 “...openable from the egress side without the use of a key or special knowledge or effort.”

The above will not allow a key operated lock from the inside.

From the Code Commentary in 1008.1.9.1 Hardware; “Any doors that are located along an accessible route for ingress or egress must have door hardware that is easy to operate by a person with limited mobility. This would include all elements of the door hardware used in typical door operation, such as door levers, locks, security changes, etc. This requirement is also an advantage for persons with arthritis in their hands. Items such as small, full-twist thumb turns or smooth circular knobs are examples of hardware that is not acceptable”. 
In your case, section 1008.1.9.3 Locks and latches allows a key operated lock from the egress side your occupancy as long as the occupant load is 300 or less. Should you choose this option there are two signage requirements. One is the locking device is readily distinguishable [2.1and [2.2] requires visible durable sign stating

“THIS DOOR TO REMAIN UNLOCKED WHEN BUILDING IS OCCUPIED”

in 1-inch high letters on the egress side of the door. Most owners will not want this on their doors especially glass doors.

Please note that “The use of the key-operated locking device is revocable by the building official for due cause.”

In plain language, egress doors:

- Shall not have a slide bolt, internal or external unless automatically operated;
- Shall not have a double keyed cylinder on any door other than the MAIN door;
- If you choose to have a double keyed cylinder, it may only be used on the MAIN door and the signage outlined above must be present.

Attached please find photos on acceptable and unacceptable locking arrangements.

Also, please note that roll down security doors may never be closed or partially closed while the business is open.

Should you have any locking arrangement other than what is allowed, you are hereby ordered to correct these violations immediately and no later than thirty days from the date of this letter. Failure to comply with the Board of Fire Prevention Regulations may result in criminal penalties pursuant to M.G.L. Chapter 148. Failure to comply with city ordinances may result in civil or criminal penalties as allowed by said ordinances.
Slide Bolts - Unacceptable

Panic Bar - Acceptable

Panic Bar With Alarm - Acceptable

Bar with Panic Hardware - Acceptable
Thumb Lock - Unacceptable

Double Key Lock - Acceptable
on main door only
With Similar Sign Below

Example

Example