



## Note Regarding UL Listings

All electrical components supplied with the booth are UL approved and the booth design meets OSHA and NFPA 33 requirements.

Most concerns by the local authorities having jurisdiction over the inspections of typical spray booth installations arise out of the Code of Federal Regulations (CFR) 29, section 1910.303 which states that, "Conductors and equipment required or permitted by this sub-part shall be acceptable only if approved" by a nationally recognized testing laboratory. The assumption made is that a paint spray booth is "equipment" under the code. Equipment is defined in section 1910.399 as "A general term including material, fittings, devices, appliances, fixtures, apparatus, and the like, used as part of, or in connection with, an electrical installation."

Section 1910.107 of the code defines a paint spray booth as a "power-ventilated structure provided to enclose or accommodate a spraying operation..." There is a significant substantive difference between "equipment" and "structure" which is made up in part of "equipment." While section 1910.107 goes into great detail as to the minimum requirements for a spraying "structure", at no point does the Section require that a paint booth "structure" be "approved."

UL approval is seldom done for assemblies of components such as paint booths, especially custom designed. This is standard practice for a wide range of industries. UL listed components may be used throughout an assembly, but the assembly as such is not UL listed.

To get an assembly listed, a complete assembly would need to be furnished for testing by UL Laboratories. For custom-built equipment, this is not workable because two units would need to be built, one for testing and one for the customer.

Other industries that do the same, in addition to paint booths, are the industrial equipment manufacturers, commercial construction, residential construction, and many others.

As an example, in all buildings are electrical panels. The enclosure is UL listed, as are the breakers, lights, switches, etc. UL did not test that particular configuration and therefore the electrical system is not UL approved. This is acceptable practice. Phone systems and LAN wiring are other examples.

If I may be of further assistance, please advise.

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