

C S Stokes and Associates Limited

Mr C Stokes



E Mail: carlstokes@firesafety-consultant.co.uk
<http://www.firesafety-consultant.co.uk>

Telephone:



10th April 2015

Mrs J Wray
TMO Health, Safety and Facilities Manager
The Network Hub
Kensington & Chelsea TMO
292A Kensal Road
London W10 5BE

Subject: Grenfell Tower Grenfell Road London W11 1TQ

Dear Janice,

Thank you for asking me to visit the above premises yesterday, Thursday the 9th April 2015, to look at the flat/lift area to staircase fire doors which a contractor has recently routed out along the door edges and fitted cold smoke seals into and also fitted new hinges on these doors. The doors on all floor levels have been worked on.

Background information

In the H M Government fire safety document, "Purpose built blocks of flats" which is the bench mark document for this building regarding fire safety arrangements, in item 62.16 on page 98, it states

Upgrading existing doors simply because they are not fitted with intumescent strips or cold smoke seals, or fail to meet some other requirement of current standards, should not be made a generic recommendation applicable to all existing blocks of flats. It goes on to say that each door must be assessed individually and the risk assessor can comment on the suitable etc of the doors.

The local fire service, London Fire Brigade, have audited Grenfell Tower under the Regulatory Reform (Fire Safety) Order 2005 (FSO) and they have not asked for either in writing or verbally for intumescent strips or cold smoke seals to be retrospectively fitted to fire doors. In fact there is a Secretary of State's determination, the highest level of judgment for the FSO on the need to fit intumescent strips or cold smoke seals to existing fire doors that do not have them. The result of this determination mirrored the comments above in the Purpose built blocks of flats document, in that the Fire Risk

Assessment (FRA) should determine if and when the retrospective fitting of intumescent strips or cold smoke seals should be undertaken to any fire doors without them.

If fire doors are retrospectively fitted with intumescent strips or cold smoke seals then the contractor that undertakes this work must be competent and qualified to undertake this work and the contractor who undertakes this work is stating that the door is still a 30 minute fire rated door after the work has been completed.

As you can see in the articles below, the first of which is from a trade leaflet, but this information was widely distributed to building companies at the time of the incident and is dated 4 years ago, contractors are also "responsible persons" in regard to the doors and they can be prosecuted by the Fire Authority. The second article is from the "Passive Fire Protection Federation" and comments on the Secretary of State's determination as mentioned above.

Contractors warned of fire door risks

27 Apr 2011

Contractors could find themselves liable for incorrectly specified fire doors, following a potentially landmark legal case.

According to Building.co.uk, fire doors are used to separate buildings into separate compartments in the outbreak of fire and, as such, are a vital component in a building's defences against the spread of fire.

"They also allow people to escape from buildings and provide some protection for fire fighters. The law regarding the correct design and configuration of fire doors is complex since doors are such a vital part of a building's passive fire protection system," it notes.

Usually, building managers are liable for Fire Safety Order prosecutions in the event that they are found to have been negligent in their duties concerning fire risks assessments and maintenance.

However, Building.co.uk explains that a recent, potentially landmark case saw a maintenance contractor prosecuted under the Regulatory Reform Order (RRO) for the first time for failing to look after a fire detection and alarm system at a Manchester care home, following the death of one resident in a fire last year.

As a result of this action, it has highlighted the importance for contractors and maintenance firms of ensuring that all fire doors are fully certified and properly configured.

The Passive Fire Protection Federation concerned about hotel fire door ruling

15 June 2012

A recent determination on the omission of intumescent strips and smoke seals on bedroom fire doors in a hotel gives cause for concern, says the Passive Fire Protection Federation.

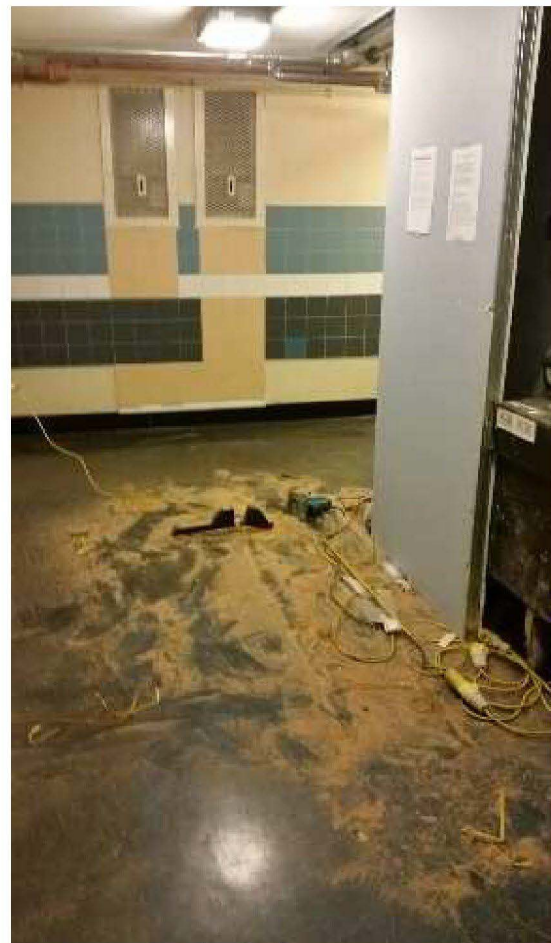
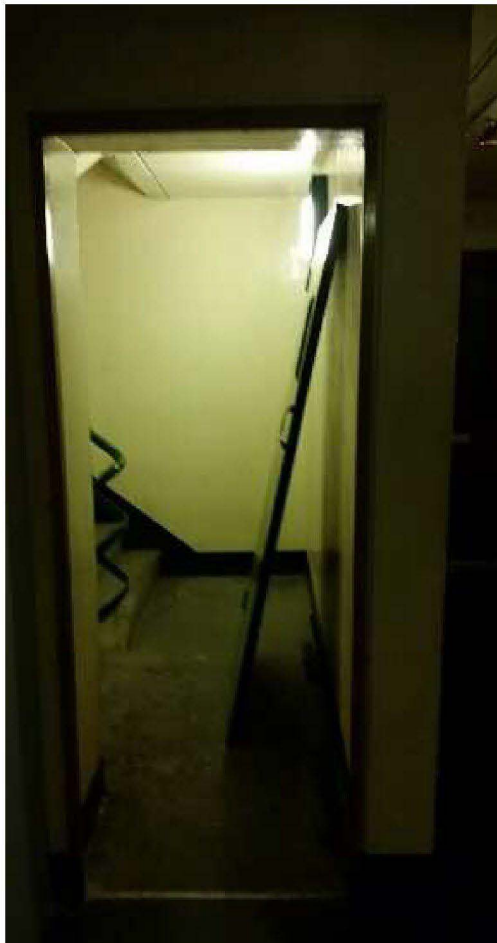
The Department for Communities and Local Government (DCLG) determination concluded that the 215-bedroom hotel did not have to commit to fitting intumescent strips and seals to all of its bedroom doors, and that it was sufficient to record and justify their absence in the fire risk assessment.

Mr Rowan said that while the Fire Safety Order requires that a suitable and sufficient fire risk assessment is undertaken, it is not a full check of compliance with Approved Document B or any other document.

“The PFP industry understands that there is no requirement under the [Fire Safety] Order to impose current guidance onto older buildings or to retrospectively upgrade buildings to the latest standards. But, if a fire risk assessor is in any doubt about the adequacy of fire protection, he or she should recommend that fire doors are upgraded or replaced to satisfy the guidance currently issued by DCLG. This includes the fitting of intumescent and smoke seals,” he said.

Work undertaken

The work on the flat/lift area to staircase fire doors in this building was started on the 19th March 2015, these are photographs of the work being undertaken, as you can see the doors were removed without any attempt to maintain the fire protection of the staircase. Doors were taken to a particular floor levels where the work was undertaken, the installed smoke detectors on the flat/lift lobby areas were not covered over or isolated in any way. Also the contractor undertaking the work did not inform any TMO employee or any Rydons employees that the work was being undertaken.





1. I would recommend that the contractor responsible for undertaking the above work is asked to provide in writing that the person (s) who has undertaken the work is suitably qualified to carry out the work. This information may be required if the Fire Authority challenge the workmanship of the fitting of the cold smoke seals etc and there is any future court case.
2. I would recommend that the contractor who has undertaken the work on these flat/lift lobby area to staircase fire doors is asked to provide in writing that each of these doors, a full door schedule should be provided, is still a 30 minute fire rated door. This information may be required to be used as evidence if the Fire Authority in the future asks about the fire rating of these doors or there is a court case after an audit or fire within this building.
3. I would strongly recommend that the contractor who undertook this work is asked to provide a full list of any fire doors that they have retrospectively fitted with intumescent strips or cold smoke seals in any other TMO premises and that these doors are inspected for workmanship etc as soon as possible.

Ventilation of the common parts of this building

As part of the refurbishment works being undertaken within this building new automatic ventilation is being installed in the staircase enclosure and also on each flat/lift lobby area, this work is being undertaken by a sub contractor for Rydons, the principle contractor for the buildings refurbishment. The presently installed ventilation system in this building relies to some extent on in flow air onto the flat/lift lobby areas from the

staircase. By the fitted of the intumescent strips and cold smoke seals to the staircase doors this may have compromised this present ventilation system.

4. I would recommend that Rydons are asked if the retrospective fitting of the intumescent strips and cold smoke seals on the staircase doors has affected the operation of the presently installed ventilation system on each flat/lift lobby area? Any comments back from Rydons should be acted upon and recorded.
5. I would recommend that Rydons are asked if the retrospective fitting of the intumescent strips and cold smoke seals on the staircase doors will affected the operation of the new automatic ventilation systems that are to be installed in the staircase and on the flat/lift lobby areas of this building? Any comments back from Rydons should be acted upon and recorded.

Work undertaken

As well as fitting of the intumescent strips and cold smoke seals on the flat/lift lobby area to staircase fire doors new hinges also appear to have been fitted, as can be seen below, there is also some damage to the door frames where the new hinges have been fitted.



6. It appears that there are no intumescent strips fitted under the hinges of the doors, as required by the British Standard. I would recommend that the contractor who undertook the work on the flat/lift lobby area to staircase doors is asked to confirm that there are intumescent strips under each and every hinge on each door? This conformation should be in writing and with photograph evidence also provided.
7. I would recommend that the contractor who undertook the work on the flat/lift lobby area to staircase doors is asked to confirm in writing that the correct fire rated hinges have been used on these doors? Copies of the manufactures information sheets for the fitted hinges with the British Standard numbers shown should be forwarded and kept on file.

Whilst the intumescent strips and cold smoke seals on the flat/lift lobby area to staircase fire doors were being fitted it can be seen that some of the door edging was planed off, this has resulted in the door now not being as wide as it originally was. The original painted door edge can be seen lower down the door and the exposed non painted door edge on the upper part of this photograph of the door edge.



8. Is the contractor who undertook the work on these flat/lift lobby area to staircase doors going to repaint/make good the doors where parts of the door were removed?

The work undertaken on these flat/lift lobby area to staircase fire doors is less than 1 month old but as can be seen from the photographs taken yesterday some strips/seals are already coming out of the grooves routed out or are missing altogether.



9. The photographs above show that the standard of workmanship in the fitting of the strips and seals appears not to be as it should be, as in less than 28 days the fitted strips and seals are not in place or are coming off. The contractor who undertook this work should be asked why the strips and seals fitted are coming out or are missing.

Conclusion

All new fire doors or door sets that are installed must have intumescent strips fitted to them and depending on the location of the fire doors cold smoke seals may have to be fitted as well. But the retrospective fitting of cold smoke seals to existing fire doors which do not have them is not a requirement, unless the Fire Risk Assessment asks for it.

The flat/lift lobby area to staircase doors in this building when they were fitted were certified fire rated doors and they complied with the Building Regulations requirements at the time of installation. These doors were tested and given their fire rating with the number of hinges previously fitted to them and without cold smoke seals being fitted. The contractor has now altered these original fire rated doors and therefore is responsible that these doors are still now fire rated ones, ie that they are still 30 minute fire rated doors.

Depending on the answers received back from the ventilation consultants working for Rydons, the cold smoke seals fitted to the flat/lift lobby area to staircase fire doors may have to be removed and the fire doors made good or the contractor who undertook the work may have to provide new certified 30 minute fire rated doors in these locations. This is because were the contractor has removed/planed off the edges of the doors the gap between the door and the door frame is now wider that it originally was before the contractor undertook the work on the fire doors. Also there are damaged areas on the door edges caused when the grooves were routed out, as can be seem below in the photograph.



Please feel free to contact me if you require any further assistance on any of the comments that I have made.

Yours Sincerely

Carl Stokes