
CARGO CONTAINERS USED AS STORAGE

Disciplines:	Structural Fire-Life Safety Access	History:	Revised 03-04-16	Revised 01-12-11 Revised 04-19-10 Issued 04-19-10
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PURPOSE: The purpose of this Interpretation of Regulations (IR) is to clarify the Division of the State Architect (DSA) definition of school building as it applies to cargo containers used as storage facilities.

BACKGROUND: Many California school districts use cargo containers (also known as “cargo boxes,” “sea vans,” or “shipping containers”) on school campuses to store materials and emergency supplies.

A cargo container is an industrial, standardized, reusable portable vessel that was originally, specifically or formally designed for use in the packing, shipping or transportation of goods or commodities, and designed to be mounted on rail car, truck or ship.

INTERPRETATION: Cargo containers used as storage units are not considered by DSA to be school buildings. The definition of “school building” is found in Title 24, Part 1, Section 4-314.

1. LIMITATIONS: School districts may install cargo containers as storage units on school campuses under their own authority and are not required to submit the design to DSA for review and approval. Cargo containers can only be installed subject to the following limitations:

- 1.1 The maximum size is no greater than 10' by 60'.
- 1.2 The height is no greater than 10'.
- 1.3 It is not used to store hazardous material that would trigger Group H occupancy.
- 1.4 They are not stacked upon each other or elevated by a substructure.
- 1.5 They are placed directly on even grade (not sloping more than 1:12) and at a distance of five feet or more away from the top of any descending inclination having slope greater than 1:12.
- 1.6 The container is not placed in fire access lanes.
- 1.7 The container is maintained so that its structural integrity is not compromised.
- 1.8 The container is not modified by the addition of doors or windows that would compromise the structural integrity.
- 1.9 The container shall be placed a minimum of twenty (20) feet from any building.
- 1.10 Containers shall not be placed within any building’s required side yard setback.
- 1.11 Containers shall be placed a minimum of five (5) feet from property lines adjoining commercial, industrial or residential zoned property.
- 1.12 Containers may have a zero (0) setback at property lines adjoining streets or public right-of-ways.

REFERENCES:

California Code of Regulations (CCR) Title 24
Part 1, California Building Standards Administrative Code, Section 4-314

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This Interpretation of Regulations (IR) is intended for use by the Division of the State Architect (DSA) staff, and as a resource for design professionals, to promote more uniform statewide criteria for plan review and construction inspection of projects within the jurisdiction of DSA which includes State of California public elementary and secondary schools (grade K–12), community colleges and state-owned or state-leased essential services buildings. This IR indicates an acceptable method for achieving compliance with applicable codes and regulations, although other methods proposed by design professionals may be considered by DSA.

This IR is reviewed on a regular basis and is subject to revision at any time. Please check the DSA website for currently effective IRs. Only IRs listed at <http://www.dgs.ca.gov/dsa/Resources/IRManual.aspx> at the time of plan submittal to DSA are considered applicable.