
CARGO CONTAINERS USED AS LABORATORY UNITS

Disciplines: Structural**History:** Revised 02/01/21

Division of the State Architect (DSA) documents referenced within this publication are available on the [DSA Publications](#) webpages.

PURPOSE

This Interpretation of Regulations (IR) clarifies DSA's position on the placement and location of cargo containers converted to laboratory pod units to be proposed for placement on public school campuses.

SCOPE

This IR is applicable to the use of cargo containers as laboratory units for COVID-19 testing on public school campuses. Cargo containers used as laboratory units on public school campuses are not considered by DSA to be school buildings as defined in California Administrative Code (CAC) Section 4-314.

This document does not pertain to conversions of cargo containers for use as school buildings.

BACKGROUND

The repurposing of cargo containers for medical-related applications is not new, nor is the placement of cargo containers to be used for storage on public school campuses (*IR A-27: Cargo Containers Used As Storage*). What is new is the opportunity to place repurposed cargo containers, designed as COVID-19 testing facilities, on public school campuses. Seeing the value of providing school districts the ability to place these units on their campuses, DSA developed this IR in the interest of doing all it can to safely return students and faculty to campuses across the State. Additionally, beyond the campus, DSA hopes the opportunities possible through this IR will also serve the community as well, should the testing facilities be made available to general public. DSA endeavors not only to achieve its mission of being *Partners in the Design and Construction of Great Schools*, it also seeks to proactively recognize and provide solutions to the problems facing its clients.

1. LIMITATIONS/REQUIREMENTS

School districts may install cargo containers converted to laboratory units (pods) for the purpose of COVID-19 testing on public school campuses under their own authority and are not required to submit the design to DSA for review and approval provided they are installed in compliance with the following:

- 1.1** Cargo container shall be general purpose conforming to ISO 1496-1 issued by the International Organization for Standards.
- 1.2** Maximum size of the laboratory unit (pod) shall be 10 feet by 20 feet (200 square feet).
- 1.3** Structural alterations (alterations to the frame and steel siding) are not allowed.
- 1.4** The laboratory units (pod) may be placed on public school campuses until December 31, 2021.
- 1.5** The laboratory unit (pod) shall be placed on even grade (not sloping more than ¼:12) and at a distance of five feet or more away from the top of any descending inclination having a slope greater than 1:12.

CARGO CONTAINERS USED AS LABORATORY UNITS

- 1.6** The laboratory units (pods) shall not be placed in or impede access to required emergency vehicle access roadways (i.e. fire lanes).
- 1.7** The laboratory units (pods) shall be located a minimum of three feet from any building and be placed a minimum of three feet from property lines adjoining commercial or residential property.
- 1.8** A zero-foot setback at property lines is permitted when adjoining streets or public rights-of-way.
- 1.9** Access is limited to laboratory personnel only. School staff and/or students are not permitted in the laboratory pod building(s).
- 1.10** Installation of the water service shall comply with the California Plumbing Code.
- 1.11** Installation of electrical service shall comply with the 2019 California Electrical Code.
- 1.12** Where the power source is by means of a diesel generator, the installation shall comply with the California Fire Code (CCR Title 24, Part 9), and local fire authority requirements.
- 1.13** The laboratory unit (pod) shall be bonded and grounded in accordance with Article 250 of the 2019 California Electrical Code.

REFERENCES:

2019 California Code of Regulations (CCR) Title 24
Part 1: California Administrative Code (CAC), Sections 4-314

This IR is intended for use by DSA staff and by design professionals to promote statewide consistency for review and approval of plans and specifications as well as construction oversight of projects within the jurisdiction of DSA, which includes State of California public schools (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 subject to revision at any time. Please check DSA's website for currently effective IRs. Only IRs listed on the webpage at www.dgs.ca.gov/dsa/publications at the time of project application submittal to DSA are considered applicable.