PURPOSE: This Interpretation of Regulations (IR) provides clarification relating to the Division of the State Architect’s (DSA) definition of school building as it applies to cargo containers used as storage facilities on public school campuses.

BACKGROUND: 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, to be mounted on rail car, truck or ship.

Many California school districts use cargo containers (also known as cargo boxes, sea vans, shipping containers or conexs) on school campuses to store various materials.

INTERPRETATION: Cargo containers used as storage units on public school campuses are not considered by DSA to be school buildings as defined in the California Administrative Code (CAC), Section 4-314.

1. LIMITATIONS: School districts may install cargo containers as storage units 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 all of the following limitations:

1.1 The maximum size is 10’ wide by 60’ long.

1.2 The maximum height is 10’.

1.3 They are not used to store hazardous materials exceeding the exempted quantities as indicated on CBC Tables 307.1(1) and 307.1(2). The school district is responsible for contacting the local regulating authority regarding any necessary storage and use permits.

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 1/4:12) 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 They are not placed in fire access lanes.

1.7 They are maintained to ensure their structural integrity is not compromised.

1.8 They are not modified by the addition of doors or windows.

1.9 They are located a minimum of twenty (20) feet from any building.

1.10 They shall not be placed within any building’s required side yard setback.

1.11 They shall be placed a minimum of five (5) feet from property lines adjoining commercial, industrial or residential zoned property.

1.12 They 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 Administrative Code (CAC), Section 4-314
   Part 2, California Building Code

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.