INTERPRETIVE MEMORANDUM 2013-07

To: LA Licensed Architects
LA Licensed Engineers
Felicia Cooper, Deputy Asst Secretary/Plan Review, OSFM
Chief Dan Wallis, Deputy Asst Fire Marshal Enforcement/Emergency Services, OSFM
Stephen Gogreve, Manager, OSFM
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From: Don Zeringue, Chief Architect/Plan Review, OSFM

Approved by: Chief Butch Browning, State Fire Marshal

Date: June 27, 2013

RE: Evaluation of Conex (Seacan) Containers used as Storage Occupancies

This memo is intended to clarify evaluations of Conex Storage Occupancies statewide by this office.

Conex containers are typically defined as a large metal intermodal container (freight container, ISO container, shipping container, hi-cube container, box, Conex box and sea can) is a standardized reusable steel box used for the safe, efficient and secure storage and movement of materials and products within a global containerized intermodal freight transport system. “Intermodal” indicates that the container can be moved from one mode of transport to another (from ship, to rail, to truck) without unloading and reloading the contents of the container. Containers are entered via two steel doors on one end with a cam locking system capable of being operated only from the exterior of the container.

There are three classifications of uses by this office for these containers. They are Permanent, Temporary, and Seasonal. Permanent use of containers for occupancy other than storage shall be submitted to this office for full plan review. Exemption from plan review and inspection are not intended to circumvent compliance with the requirements of NFPA 401 and any applicable rules and regulations enforced by this office or Local Building Official. Distance from buildings and between individual containers shall be a minimum of 10 feet.

Permanent Conex storage structures are used for over 12 months at same site location and shall meet the full requirements of NFPA 101 and possibly a requirement for review as an Industrialized Building. Owners shall submit a Plan Review Application and required documentation to this office for review and inspection.

Temporary Conex storage structures are used and occupied for 12 months or less and shall not be reviewed or inspected by this office if a written method of protection is posted and adhered to by the company using the container.

Seasonal Conex storage container used for ordinary hazard mercantile storage overflow and dropped off by shipping company AS A TRAILER SHALL not be reviewed or inspected by this office.