



Shipping Containers and Storage Trailers

The placement of shipping containers, storage trailers or other transportation vessels on commercial property pose significant concerns for fire and life safety. Shipping containers and semi-trailers are typically used as a low-cost storage solution but pose unforeseen problems.



Figure 1: Shipping Container on Highway Chassis

Shipping Containers and semi-trailers are regulated and inspected in accordance with USDOT FMCSA rules and regulations. While under those regulations, shipping containers and storage trailers are not subject to building and fire codes so long as they remain a transportation vessel in active compliance with USDOT FMCSA regulations.



Figure 2: Shipping Container (No longer treated as transportation vessel)

As the West County EMS & Fire Protection District does not have any active authorized multi-modal or intermodal facility where shipping containers are authorized to be interchanged and/or stored between highway and rail transportation chassis, once a shipping container is placed on the ground it is no longer an authorized transportation vessel and is treated as a structure subject to regulation by the adopted codes of this District.

Semi-trailers parked or placed on commercial property, including backed into a commercial building dock, must remain subject to and in compliance with USDOT FMCSA rules and regulations, as evidenced by being maintained in full roadworthy condition. This shall be evidenced by having all tires fully inflated, all lights and lenses present and unbroken, no evidence of moss/weeds/unkept vegetation on, under or in the immediate vicinity of the trailer and no storage of objects beneath the trailer which would prevent immediate removal of the trailer by a semi-tractor. Once a semi-trailer parked or placed on commercial property no longer satisfies these criteria, the trailer must be removed, made compliant with USDOT



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FMCSA rules and regulations or it will be subject to regulation by the District under the applicable codes as a former transportation vessel being repurposed as a storage structure.



Figure 3: Roadworthy Semi-Trailer

Any shipping container no longer on a highway chassis and any semi-trailer no longer maintained to USDOT FMCSA standards shall feature the following at a minimum:

1. Placement on the commercial lot in a location that is identified on an approved Site Plan Permit issued by the District
2. The number of fire exits required by the adopted codes for a structure of the particular size and use of the container or trailer.
3. Egress-compliant hardware for required fire exit.
4. Exit signing per code requirements
5. Emergency lighting per code requirements
6. Egress pathways per code requirements
7. Separation from adjacent structures per code requirements
8. Stairs, walkways and/or handrails for egress per code requirements

Where a container or trailer no longer qualifying as a transportation vessel has been placed on a commercial property without being in compliance with a Site Plan Permit issued by the District, each container and/or trailer shall be considered an unauthorized commercial structure and subject to the penalties and fees associated with unauthorized and/or unpermitted construction.

Examples of Compliant Solutions:



Figure 4: Repurposed Shipping Container with egress door (subject to Site Plan Approval)



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Examples of Non-Compliant Solutions:





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Current West County EMS & Fire Protection District Codes

- (IBC) International Building Code –2024 Edition w/Amendments
- (IEBC) International Existing Building Code – 2024 Edition w/Amendments
- (IFC) International Fire Code – 2024 Edition w/Amendments
- (WC) West County Overarching Building and Fire Code 2024 Edition

NFPA Codes versions are the versions as referenced under ICC 2024 except as provided for in the West County Overarching Building and Fire Code

If a separate permitting jurisdiction (with authority to issue permits for a project within the West County EMS & Fire service area) has adopted a different code where a provision of the codes are in actual or perceived conflict, the most conservative conditions, requirements or interpretations of the two codes will control in the interest of public safety.