



El Paso Fire Department
Fire Prevention Division
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Outside Storage of Combustible Material (OSCOM) Guidance

Combustible Material

Combustible material (CM) is any material or solid waste that poses a significant fire hazard if ignited and will readily burn.

CM includes the following material; however, it is not limited to only these examples:

- paper
- cardboard
- wood
- plastics
- rubber
- fluff

For the purposes of this permit, CM does **not** include:

- metals
- non-solids (liquids or gases)
- explosives

Outside Storage

Only CM stored outside is regulated by this ordinance. Outside storage means any CM that is not stored **in a building or structure**.

The fire department maintains a list of fully-enclosed containers, such as trash compactors, that are exempt from the ordinance, as long as the containers meet the conditions identified on the approved container list.

CM stored under a roofed structure with only support structures and no walls to enclose the material **is considered outside storage** by this ordinance.

Types of Outside Storage

CM may be stored outside in two manners, loose or baled. **Loose storage** means the CM is neither baled nor enclosed in containers. **Baled storage** means CM that is baled or stored in containers. A **unit** is a set of stacks, bales, pallets, containers or piles that contain the same type of CM. Based on whether a unit is considered baled storage or loose storage, there are specific limits on the size of the unit (see **Storage** section in this guidance).

Permit Required

An OSCOM permit **is required** for facilities that store more than **75 cubic yards** of CM outside that is not stored in fully-enclosed, approved containers.

Currently, only **operations** covered under operational permits for **lumber yards or tire storage** are not required to obtain an OSCOM permit, unless the facility also conducts operations not covered within those operational permits. If any outside storage of more than 75 cubic yards of CM exists at your facility, it is recommended that you contact the fire department to verify whether an OSCOM permit would be required.

Obtaining a Permit

To obtain a permit, you must complete an application, supplying all of the **required information**:

- Name and physical address of facility
- Name and mailing address of facility owner
- Name and mailing address of property owner
- Description of CM stored outside
- Estimated quantity of CM stored outside
- Facility diagram indicating storage locations for each CM unit stored outside
- Method of storage for each unit (baled or loose)

In addition to the required information, a facility seeking a permit will also be required to obtain either **\$1 million or \$2 million liability insurance**, and provide proof with the permit application. The amount of insurance required is base on the amount of CM stored at the facility (see **Financial Responsibility** section in this guidance).

Lastly, the appropriate **permit fee** will be required, based on the amount of CM stored outside at the facility.

Permit Term

When a permit application is approved, a permit will be issued for the facility, which shall be **valid for one year**, unless revoked by the department. For an application that is **incomplete**, the department will notify the applicant in writing that the permit has been **denied**, and will inform the applicant of the deficiencies that need to be addressed so that a new application can be submitted by the applicant and reviewed by the department.

An OSCOM Permit **may be revoked** by the department for **any** of the following reasons:

- When an applicant has provided false, incorrect or misleading information on a permit application or renewal application.
- When more than two written notices of violation of this ordinance have been issued to a facility within a 12-month period.
- When a **violation of the permit** has been documented during or immediately following a **fire at the facility**.

Permit Requirements

The following requirements must be followed for permitted facilities:

- Maintain a facility fire plan (see **Fire Plan** section of this guidance)
- One 2A20BC fire extinguisher per unit (within 50 feet of unit)
- One 2A20BC fire extinguisher mounted on each vehicle that manages, loads or moves CM
- Installation of a wall or fence, in compliance with applicable zoning ordinances, that prevents public from access to CM
- Maintain financial responsibility (liability insurance)

Storage

The dimensions of unit storage depend on whether the unit consists of baled storage or loose storage. The amount of CM that can be stored within a unit of loose storage is more restricted than with baled storage.

Loose Storage

- Usually consists of “piles” of CM
- Unit height cannot exceed 8 feet
- Unit footprint perimeter cannot exceed 300 feet around its base

Baled Storage

- May consist of any baled, palletted or containerized CM

- Unit height cannot exceed 12 feet
- Unit footprint perimeter cannot exceed 500 feet around its base

Buffer Zone

At buffer zone of at least 20 feet is required between any **unit of CM and the fence or wall** identified in the permit requirements. This area must **at all times** be kept free of material, waste, equipment or any other items, in order to provide firefighters' safe access to the unit in the event of a fire.

If you store CM in units consisting of **approved containers identified by the department**, the 20-foot buffer zone **may** be reduced to 10 feet, subject to review by the department.

Storage Separation Space

A separation space of 20 feet must be maintained at all times between units. As with the buffer zone, this space must be kept free and clear at all times.

The storage separation space **may** be reduced when CM is stored in **approved containers**, subject to review by the department.

Fire Plan

The facility fire plan required by the permit must be maintained at the facility, and made available for review during an inspection by the department. It is **not** necessary to submit the plan to the department in advance, as long as it contains the necessary components.

Keep in mind, however, that the fire plan is subject to the approval of the fire official, and may be requested at any time by the department, during but not limited to routine inspections, complaint inspections, or in the course of a fire incident investigation. Any deficiencies identified in the fire plan during review by the fire official would need to be addressed at that time, otherwise it would not be considered "approved by the fire official."

Fire Plan Components

- Description of all CM at facility
- Manner in which CM is stored
- Map with facility evacuation routes for employees
- Fire awareness and prevention orientation training for employees, along with documentation of attendees and training dates
- Site plan indicating fixed structures, storage units and fire extinguisher locations
- Installation of a facility fire alarm system (see **Fire Alarm** subsection)
- Installation of wall or fence to prevent public access to CM units

Fire Alarm

The facility fire alarm system is required; however, the type is optional. Install a system that makes the most sense at your facility (examples provided below); however, the fire official may determine that another method must be used if the type you have identified is deemed inadequate.

- Public address system or steam horn that can be used to alert all facility employees of the need to evacuate during a fire
- Pull-type fire alarm points wired to a light and siren alarm system around the facility
- Internal communication devices, such as cell phones or walkie-talkies; although this method would not be adequate at larger facilities with numerous employees. In addition, if this method is used, all employees working outside at the facility would be required to have a communication device issued and present on their person at all times when on duty.

- While not required, it is strongly recommended to conduct monthly fire drills to ensure that the system is operational and that facility employees are knowledgeable of the evacuation routes. **If your alarm system is tied in to the fire department, you must coordinate with the department in advance of a fire drill.**

Financial Responsibility

A public liability insurance policy is required for OSCOM-permitted facilities, which insures for claims for damages for personal injury, including accidental death, as well as for claim for property damage that may arise from outside storage of combustible material associated with the facility.

Tier 1 Facilities

- Facilities that have either one unit of baled storage, one unit of loose storage, or one unit of each type
- Requires \$1 million liability coverage

Tier 2 Facilities

- Facilities that have more than one unit of baled storage, more than one unit of loose storage, or any combination of more than two units of loose or baled storage
- Requires \$2 million liability coverage

Proof of financial responsibility must be presented with the permit application, and must be made available for review during any inspection by the department.