



# Florida Division of State Fire Marshal

The Florida Fire Marshals and Inspectors Association,  
"Organization" (§633.026)

## Informal Interpretation Request

Date: 4/9/24

National Fire Protection Association (NFPA) Document No. applied by the LFO: FFPC: NFPA 1  
Edition of the NFPA Document: FFPC 7th Edition, NFPA 1 2018  
Chapter and Paragraph of the NFPA Document: 34.9.3.1.4

*Explain how the Petitioner's substantial interests are being affected by the LFO's interpretation of the NFPA citation above:*

The LFO has interpreted Section 34.9.3.1.4 to require all aisles between single-row racks to be at least 8-feet and not just Main Aisles. This reduces the available volume of tire storage.

*Enter a statement of the LFO's interpretation of the NFPA citation above and identify the manner in which the statement was rendered:*

In a formal permit comment, the LFO has interpreted Section 34.9.3.1.4 to require all aisles in a tire storage pile to be a minimum of 8-feet. He has based this interpretation on the definition of 'aisle width'. Section 3.3.8 (NFPA 1) defines aisle width as, "The horizontal dimension between the face of the loads in racks under consideration." Since there is only one definition of aisle width the LFO has applied this to all aisles and not differentiated between a Main Aisle and other aisles within the Pile.

Our racking plan has 3-foot aisles between single-row racks. We also have an 8-foot Main Aisle to separate the Pile.

*Enter a statement of the interpretation that the Petitioner contends should be given to the NFPA citation above and a statement supporting the Petitioner's interpretation:*

Are Operating Aisles within a tire storage pile permitted to be any width so long as they provide minimum egress width where necessary?

Is the Main Aisle distinct from the operating aisle?

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Rulings herein expressed are not the formal position of the Florida State Fire Marshal's Office

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NFPA Document No. that is the subject of the question: FFPC: NFPA 1

Edition of the NFPA Document: FFPC 7th Edition, NFPA 1 2018

Chapter and Paragraph of the NFPA Document: 34.9.3.1.4

*Explain how the Petitioner's substantial interests are being affected by the question below:*

If all aisles must be 8-feet the volume of storage in the building is substantially reduced.  
If all aisles must be at least 8-feet that eliminates the ability to have racks of tire storage  
less than 8-feet and then only multi-row racks, in which there is no aisle between rack,  
is allowed.

*Enter the Petitioner's question concerning an interpretation of the FFPC:*

Are all aisles within a tire storage pile required to be at least 8-feet?

Explanatory Information. High-piled storage is defined as, "Solid-piled, palletized, rack storage, bin box, and shelf storage in excess of 12 ft (3.7 m) in height."The term 'Pile' is not defined. We use the term Pile here to mean "Any combination of Solid-piled, palletized, rack storage, bin box, or shelf storage in excess of 12 ft (3.7 m) in height that is separated from other piles by a main aisle".The term 'Main Aisle' is not defined in NFPA 1, but it is described in the Figure A.34.9.3.1.1. For indoor tire storage the Main Aisle must be at least 8-feet wide." The term 'Operating Aisle' is not defined in NFPA 1, we have used the term here to mean the aisle within a Pile that is used to access and operate around the storage racks. It is noted that the International Fire Code defines high piles storage as, "Below is the proposed tire storage arrangement. In this arrangement there are 3-foot Operating Aisles between single row racks. There is also an 8-foot Main Aisle between the Piles. The local LFO has interpreted Section 34.9.3.1.1 to require that the service aisles between single-row racks must be at least 8-feet wide.

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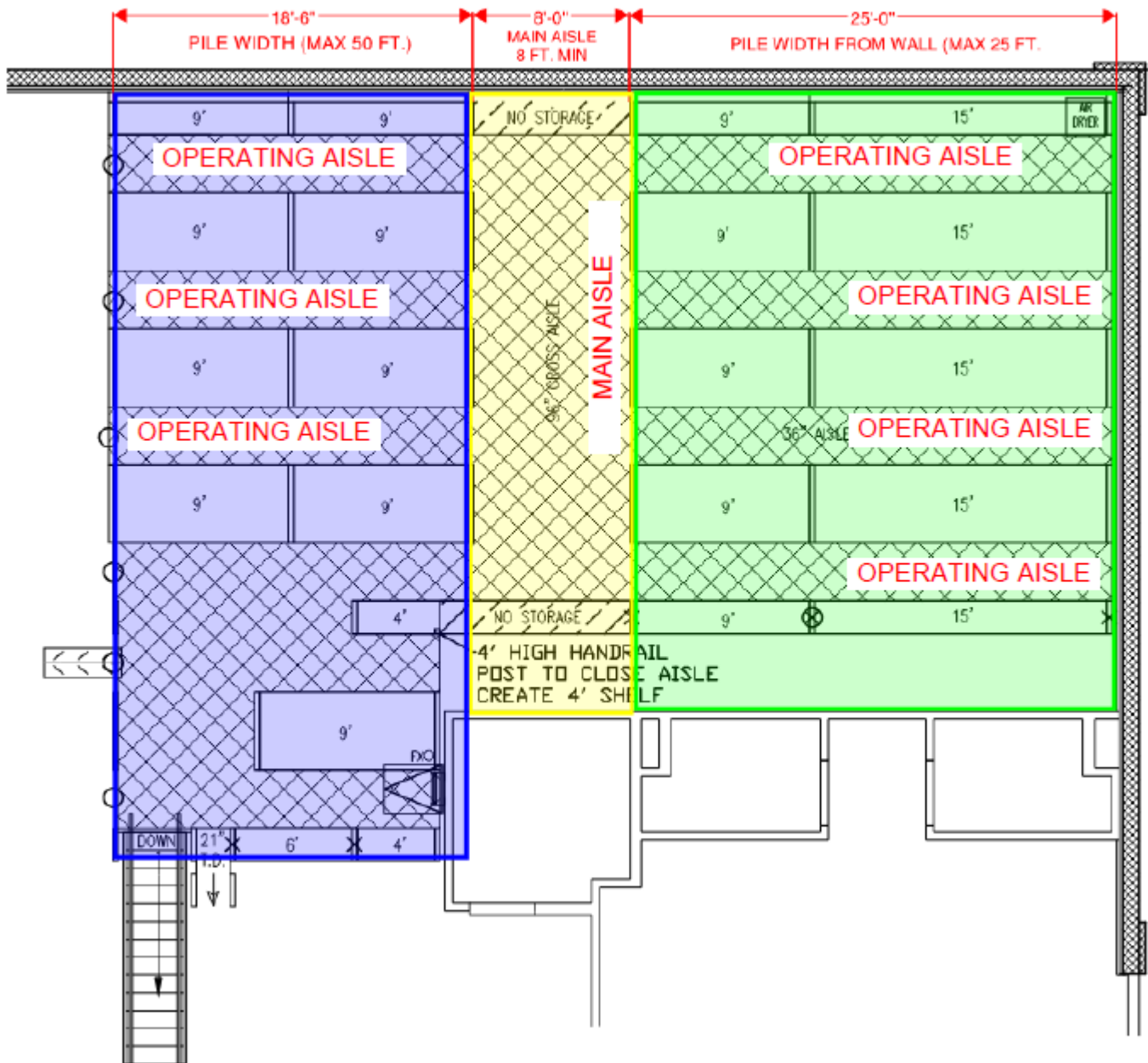
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Code ×

NFPA 1 – FIRE CODE (2021)

A.34.9.3.1.1

Limiting the pile length is not intended. (See [Figure A.34.9.3.1.1.](#))

Legend  
L — Length  
W — Width

⚠ Figure A.34.9.3.1.1 Typical Tire Piling Arrangement.

+ Add to Reference Panel Open in Book View

## 34.9.3.1 Piling Procedures.

### 34.9.3.1.1\*

Piles that are not adjacent to or located along a wall shall be not more than 50 ft width.

### 34.9.3.1.2

Tires stored adjacent to or along one wall shall not extend more than 25 ft (7.6

### 34.9.3.1.3

Where tires are stored on-tread, the dimension of the pile in the direction of the aisle shall be not more than 50 ft (15 m).

### 34.9.3.1.4

The width of the main aisles between piles shall be not less than 8 ft (2.4 m).

## Committee Answer: No

Without further explanatory material provided by NFPA, we would suggest the 8' minimum width is required between piles that would otherwise exceed the 25' or 50' maximums.

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For example, two 30' wide piles would need an 8' aisle between them because a smaller aisle would not provide sufficient separation to consider these piles separate and would therefore exceed the 50' maximum. However, two 20' piles could be separated by a 3' wide aisle (provided this is sufficient for egress) because the two would not exceed the 50' maximum.

Without further clarification from NFPA, our assumption would be the 8' wide aisles would limit the possibility of fire spreading quicker than sprinklers or manual suppression can control the fire. We don't see where two 20' wide piles with a 3' separation would be a higher hazard than one 50' wide pile.

Note: the AHJ can dictate aisle spacing requirements based on the adequacy of sprinkler coverage as well as manual suppression efforts and response capabilities of the responding fire department not considered in this interpretation.

**Region 1** - Delegate: Byron Bennett, North Bay Fire Control District  
Alternate: William (Michael) Hall, Marianna Fire Rescue

**Region 2** - Delegate: Jason R. Greisl, Tallahassee Fire  
Alternate: Vacant

**Region 3** - Delegate: James Groff, Jacksonville F. R. (Committee Chair)  
Alternate: Silver Chip Ware

**Region 4** - Delegate: Taylor Riley, Lakeland Fire Rescue  
Alternate: Christopher Astleford, Pinellas Park Fire Dept.

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**Region 5** - Delegate: Anthony Apfelbeck, Altamonte Springs Building Department  
Alternate: Christina Diaz, Seminole County Fire Department

**Region 6** - Delegate: Robert Salvaggio, Cape Coral Fire Rescue  
Alternate: Charles Raborn Cape Coral Fire Rescue

**Region 7** - Delegate: (Kenneth) Sean Brown, Broward Sheriff Fire Rescue & Emergency Services  
Alternate: Rebecca Geimer Tamarac Fire Rescue



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