

# Placement of Electric Vehicle Chargers at Motor Fuel Facilities: Energy Marketers of America Comments on National Fire Protection Association Tentative Interim Amendment



**Walter Wright, Jr.**  
wwright@mwlaw.com  
(501) 688.8839

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The Energy Marketers of America (“EMA”) submitted comments to the National Fire Protection Association’s (“NFPA”) Tentative Interim Amendment (“TIA”) Log No. 1621.

The TIA would regulate the placement of charging stations at retail motor fuel facilities.

EMA, previously known as the Petroleum Marketers Association of America, describes itself as a federation of 47 state and regional trade associations representing energy marketers throughout the United States. EMA members are stated to supply 80 percent of all finished motor fuel products sold nationwide including renewable hydrocarbon biofuels, gasoline, diesel fuel, biofuels, heating fuel, jet fuel, kerosene, racing fuel and lubricating oils. The membership owns and operates 60,000 retail motor fuel locations across the country.

The Arkansas Oil Marketers Association is a state chapter of EMA.

The EMA comments express opposition to the implementation of the TIA as currently written.

Section 15.3.1 of the proposed TIA requires a setback of 10 feet from property lines and three feet or 10 feet from buildings depending on the fire rating of the building materials.

The opposition is driven by the organization’s concern that setback standards in the TIA are so restrictive that it could prevent the installation of EV chargers at most existing retail motor fuel facilities.

EMA takes the position that this provision is:

. . . inconsistent with common practices for the installation of EV chargers and is outside the scope of this code . . .

In support of its argument regarding proposed Section 15.3.1 (Location Adjacent to Buildings or Property Lines) the comments note in part:

- If an EV charging space meets the requirements for separation from the fuel storage, handling and dispensing equipment, the code should not address the more universal issue of setbacks from buildings or property lines or buildings.

- The setbacks are contrary to current installation practices not only at a motor fueling facility, but anywhere EV chargers are being installed.
- The unintended consequences of applying this section of the code should not exclude motor fueling facilities from the opportunity to be part of the development of an EV charging infrastructure.

The comments also address:

- Section 15.3.2(6) (Location of a tank vehicle while transferring flammable or combustible liquids to an aboveground or underground storage tank) (Opposing a 25 foot separation from a tank vehicle because it is deemed excessive in comparison to the separation distances for points on a tank that are accessed by the tank vehicle while transferring fuel)
- Section 15.9.4 (Combined emergency shutoff devices for fueling systems and EV chargers) (Concern is expressed over the ability and potential complexity of combining the emergency shutoff for fuel dispensing equipment and EV chargers)
- Section 15.5.2 (Guard Posts) (Detailed description of guard post installations goes beyond what is currently required in Section 6.3.4 of the code for protection against collision damage for a fuel dispenser)

NFPA is an international nonprofit organization founded in 1896 to reduce fire and other hazards by providing and advocating consensus codes and standards, research, training and education. The organization states it develops more than 300 codes and standards to minimize the possibility and effects of fires and other hazards.

A copy of the comments can be downloaded [here](#).