

907 – 350 Sparks, Ottawa ON K1R 7S8 T (613) 230-2600 | F (613) 230-5142

info@fertilizercanada.ca fertilizercanada.ca | fertilisantscanada.ca

May 9, 2017

TO:	Fertilizer Canada members
FROM:	Giulia Brutesco, Senior Director, Industry Standards

RE: New Rules for Placards on Nurse Tanks Come into Force June 1, 2017

Further to the memo issued by Fertilizer Canada and the Canadian Association of Agri-Retailers on January 12, 2017, the respective Equivalency Certificates (SH 10006 – Ren 5 and SH 6171 – Ren 9) allowing placards on only the two longs sides of a nurse tank will expire on May 31, 2017.

Beginning June 1, 2017, nurse tanks will require placards identifying that it is carrying ammonia (UN 1005) <u>on all four sides</u> in a manner that complies with Part 4 (Dangerous Goods Safety Marks) of the *Transportation of Dangerous Goods* (TDG) regulations.

Section 4.7 of the TDG regulations describes the size and orientation of labels and placards on a large means of containment. Subsection (3) describes that each side of the placard must be at least 250 mm in length. However, if a placard of that size cannot be displayed properly due to the irregular shape or size of the tank, then a smaller placard can be used so long as the length of the sides is not less than 100 mm.

Fertilizer Canada sought an interpretation from Transport Canada to better understand what is considered an acceptable placard size. It is Transport Canada's view that at least three full-sized placards can be displayed on a nurse tank in most cases. It will be left to the judgment of the TDG inspector to determine if it is possible to fit a placard of 250 mm in length or if a reduced-size placard is needed.

While a placard of 100 mm in length is considered to comply with the TDG regulation, it will be up to the tank owner to demonstrate that a larger placard size is not feasible. Transport Canada has indicated that they have noticed many nurse tank owners already display four placards without any difficulty.

Fertilizer Canada strongly recommends tank owners unsure of their placarding needs contact their regional Transport Canada office for assistance.

Should you have any questions pertaining to the regulatory obligations, please do not hesitate to contact me directly.

Regards,

Giulia Brutesco, P.Eng. Senior Director, Industry Standards Email: <u>gbrutesco@fertilizercanada.ca</u> T: 613-786-3037