



September 7, 2016

## BULLETIN # 03-2016

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### Implementation Guide Section C10.5 – Pull-Away Protection Technology Clarification

On July 1, 2016, Fertilizer Canada released the 2017 revision of the Ammonia Code of Practice for implementation. Some of the new requirements and clarifications include expansion/renovations of sites, lapses in certification, maintenance schedules and pull-away protection on nurse wagons which sites are expected to be in compliance by January 1, 2017.

Since the revision publication, it was brought to Fertilizer Canada's attention that there is some confusion regarding what is considered acceptable technology to comply with the section C10.5, which requires pull-away protection on nurse wagons. The implementation guide currently includes tripod couplers as viable technology. While tripod couplers are an acceptable technology for stationary tanks, they are not considered acceptable for nurse wagons. In addition, another technology that has been identified as acceptable is smart hoses. To incorporate this technology and to provide additional guidance, some additional language is warranted:

*Pull-away protection is defined as emergency ~~shutoff-capability~~ discharge control in the event of a pull-away. Examples include, but are not limited to ~~tripod-couplers-smart~~ hoses, wire actuated emergency shutoff devices, air actuated shutoff, electronic/wireless actuated shutoff, etc. Excess flow valves alone are not regarded as adequate for compliance with this section.*

*In order to manage the risk of releases during transport or field operation, nurse tanks must be equipped with pull-away protection that is able to stop the flow of product due to a hose break or other equipment malfunction.*

*Please refer to the CSA B620/B622 standard for the emergency discharge control requirements outlined in Clause 5.3.2.5 and 6.2.9.3 of the following versions: CAN/CSA-B620-98, CSA B620-09 or CSA B620-09.*

The pull-away protection requirement continues to apply only to tanks that meet the volume threshold: capacity of 10,000L or more, or any multi-tank configuration. New tanks meeting the capacity threshold must be equipped with functioning pull-away protection on or after January 1, 2017 while existing tanks must comply with section C10.5 by January 1, 2022.

This language better reflects the discussions of the issue of pull-away protection on nurse wagons with the Ammonia Code Working Group as well as the Fertilizer Safety and Security Council Steering Committee. In addition, after discussions with the Ammonia Code auditors regarding this issue, they were in agreement with the inclusion of the additional language and that it provided substantive guidance for auditing purposes. If agri-retailers have any questions about acceptable pull-away protection, they can reach out to their local auditor.



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This clarification is effective immediately and the Code will be revised to reflect the new language. Any questions or concerns can be directed to Fertilizer Canada or can be directed to the Ammonia Code Senior Auditor, Dennis Black via email: [deblack1@mts.net](mailto:deblack1@mts.net) or via phone: 204-512-2109, or the Ammonia Code Project Manager, Anthony Laycock via email: [ammoniacode@funnel.ca](mailto:ammoniacode@funnel.ca).

Regards,

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