



FERTILIZER CANADA

FERTILISANTS CANADA

907 – 350 Sparks, Ottawa ON K1R 7S8

T (613) 230-2600 | F (613) 230-5142

info@fertilizercanada.ca

fertilizercanada.ca | fertilisantscanada.ca

June 1, 2017

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

RE: Clarification on Sizing Placards on Nurse Tanks

Fertilizer Canada has received a number of questions regarding the proper size of placard that would be acceptable under section 4.7 (3) of the *Transportation of Dangerous Goods (TDG) Regulations*. Further to the memos issued January 12 and April 27, the following information is intended to provide additional guidance on the placarding size requirements.

Placards provide important information on the dangerous good carried by the tank and needs to be displayed clearly. First responders and other authorities use the placard's UN number and symbol to identify the product and risks in order to determine how best to manage an incident.

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.

It is the responsibility of the tank owner to demonstrate which placard size is appropriate and provide rationale as to why a larger placard is not feasible should a TC inspector request it. While a placard of 100 mm in length is considered a minimum to comply with the subsection 4.7(3) of the TDG Regulations, the requirement is to keep the placard as large as possible to the point it will fit the tank and maintain legibility.

It is Transport Canada's view that at least three full-sized placards can be displayed on a nurse tank in most cases. Nurse tanks vary in size and the ability to affix a full-sized placard may also vary. Section 4.7 (3) provides flexibility on placard sizing that allows compliance options for these varied design constraints. It will be left to the judgment of the TDG inspector if it is possible to fit a placard of 250 mm in length or if a reduced-size placard is needed. Fertilizer Canada strongly recommends tank owners unsure of their placarding needs contact their regional Transport Canada office for assistance.

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

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: gbrutesco@fertilizercanada.ca
T: 613-786-3037