



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, D.C. 20590

JUL 29 2008

Ms. Pam Guffain
Vice President, Member Services
The Fertilizer Institute
820 First Street, N.E. Suite 430
Washington, D.C. 20002

Ref. No.: 08-0059

Dear Ms. Guffain:

This responds to your letter regarding the placarding requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to Anhydrous Ammonia shipped from Canada to the United States. Specifically, you ask if the placard required under Canada's Transportation of Dangerous Goods (TDG) Regulations is acceptable when shipping Anhydrous Ammonia from Canada into the United States by highway or rail.

The answer is yes. Shipments of Anhydrous Ammonia prepared in accordance with the TDG Regulations are not required to be labeled or placarded with POISON INHALATION HAZARD or POISON GAS labels or placards (See §171.23(b)(10)(iv)). Thus, a package containing "Anhydrous Ammonia" shipped to the United States from Canada by motor carrier or rail car may be labeled or placarded in accordance with the TDG Regulations.

Special Provision "13", in § 172.102, specifies that for "Anhydrous ammonia," the words "Inhalation Hazard" must be entered on each shipping paper in association with the shipping description, and each non-bulk package must be marked "'INHALATION HAZARD'" in association with the proper shipping name and identification number. Bulk packages must be marked on two opposing sides with the words 'INHALATION HAZARD'. The size of the marking on bulk packages must conform to § 172.302(b).

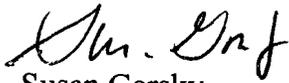
For your information, Amendment 6 of the TDG Regulations was published in the Canada Gazette, Part I, on September 30, 2006. The new subsection 4.18(5) requires that one of the following placards must be displayed when UN1005, ANHYDROUS AMMONIA, is contained in a large means of containment:

- Until August 31, 2008, the Class 2.2, Class 2.3 or the new Anhydrous Ammonia placard (see the Appendix to Part 4 of the TDG Regulations);

- After August 31, 2008, the Class 2.3 placard or the new Anhydrous Ammonia placard; and
- On at least two sides, the words “Anhydrous Ammonia, Inhalation Hazard” on a contrasting background in letters with a width of at least 6mm and a height of at least 50 mm when the Anhydrous Ammonia placard is displayed on it.

I hope this satisfies your inquiry. If we can be of further assistance, please contact us.

Sincerely,



Susan Gorsky
Acting Chief, Standards Development
Office of Hazardous Materials Standards

Engram
§171.12a
Placarding
08-0059

Drakeford, Carolyn <PHMSA>

From: Gorsky, Susan <PHMSA>
Sent: Thursday, February 28, 2008 1:38 PM
To: Drakeford, Carolyn <PHMSA>
Subject: FW: Canadian Reclassification

I realize this is a bit unorthodox, but could you assign this for response? Her question relates to placarding requirements for shipments of anhydrous ammonia from Canada into the United States. Specifically, she wants to know if the placard required under Canada's Transport of Dangerous Goods regulations is acceptable when the shipment comes into the United States.

Susan

From: Pam Guffain [mailto:PGuffain@tfi.org]
Sent: Wednesday, February 27, 2008 1:59 PM
To: Gorsky, Susan <PHMSA>
Subject: Canadian Reclassification

Dear Susan,

Great meeting today. Thanks. We will be back in touch with you all soon on this issue.

As we talked, would you mind confirming in writing that our reciprocity is ok now that Canada has formally reclassified ammonia. It would help my members if they saw it in writing!

Again, congratulations on your decision to retire!

Pam

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