



May 17, 2018

NFPA 400-2016 and Proposed 2019 Editions

*Hazardous Materials Code*

Re: TIA Log No.: 1361

Reference: 3.3.13 Calcium Ammonium Nitrate (new), 11.1.1.2; and A.3.3.13 (new)

The Agricultural Retailers Association (ARA) writes in support of the proposed amendments (TIA Log No.: 1361) to the NFPA 400 regarding Calcium Ammonium Nitrate (CAN). ARA is a not-for-profit trade association that represents the nation's agricultural retailers and distributors. ARA members provide goods and services to farmers and ranchers which include: fertilizer, crop protection chemicals, seed, crop scouting, soil testing, custom application of pesticides and fertilizers, and development of comprehensive nutrient management plans. Retail and distribution facilities are scattered throughout all 50 states and range in size from small family-held businesses or farmer cooperatives to large companies with multiple outlets.

Ammonium nitrate (AN) is a unique fertilizer that has important purposes in the agricultural industry. Certain regions in the country require AN in order for the crops to yield their potential. However, as you know, AN is an oxidizer and has the capacity to be an explosive. The product deserves special attention to how it is stored and handled.

ARA shares the goal of NFPA to create consistent and predictable standards to properly handle products. ARA is constantly looking to improve the workplace safety and security for our members and their employees. The Association supports scientifically proven products that will help protect the industry, its workers, and the surrounding communities.

ARA has worked diligently to provide the industry with resources to safely and securely handle AN products. ARA is a committed partner to [ResponsibleAg](#), which was created to assist ag retailers comply with environmental, health, safety and security rules regarding the safe handling and storage

of fertilizer products, especially AN. Furthermore, ARA has produced the “[Safety and Security Guidelines for the Storage and Transportation of Fertilizer Grad Ammonium Nitrate at Fertilizer Retail and Distribution Facilities](#)” in conjunction with The Fertilizer Institute and ResponsibleAg.

ARA continues to advocate for consistent definitions of AN and AN mixtures within U.S. government agencies. For example, the Department of Homeland Security defines the product differently from the Occupational Safety and Health Administration, which defines the product differently from the Department of Transportation.

CAN has a different chemical makeup than AN products that are regulated by Chapter 11 of the NFPA 400. This chemical difference provides for an enhanced level of safe storage and handling of the product. Unlike AN, CAN is considered a non-oxidizer. It has been manufactured since 1927 and has never been involved in an accidental explosion resulting from fire. The NFPA 400 should reflect the industrial safety enhancement characteristics of CAN. ARA supports the proposed amendments to the NFPA 400 to observe the safety benefits of CAN.

Sincerely,

A handwritten signature in black ink that reads "Kyle Liske". The signature is written in a cursive style and is positioned above the typed name.

Kyle Liske

Public Policy Counsel

Agricultural Retailers Association