



To: ICC-ES Evaluation Committee

From: Michael O'Reardon

Date: October 16, 2008

Subject: Proposed Acceptance Criteria for Wood Structural Panels with
Factory-applied Fire-retardant Coatings, Subject AC405-1008-R2
(MO/SF)

MEMO

Public comments have been received regarding the subject criteria. The comments, posted on our web site, were received from the following organizations:

- Arch Wood Protection, dated October 7, 2008.
- Barrier Technology Corp., dated October 7, 2008.
- Hoover Treated Wood Products, Inc., dated October 7, 2008.
- APA, dated October 7, 2008.

Barrier and Hoover comments recommended that the criteria for fire-retardant coatings (FRC) not be approved. The common reasons they provide in their letters were that quality control, manufacturing, and the performance of the coating as regards durability, flexibility, adhesion, and life expectancy (need for FRC reapplication) are not adequately addressed in the proposed criteria. The commenters requested that the dry-film thickness rather than wet-film thickness of the coating be referenced in Section 1.4.1 for defining the product.

Commenters were also concerned that application of the FRC could result in modifications to the original wood structural panel labeling and span rating. There is also a concern about the need to test different wood species and thickness of panels.

Staff requests further input on the following points:

1. Revising the definition Section 1.4.1 to clarify the use of wet-film or dry-film thickness for minimum coating thickness.
2. Relabeling for span ratings as noted in Section 2.1.3. Additional information is needed for this section clarifying that an inspection agency accredited for wood structural panel products shall be responsible for relabeling for span ratings, and that fire performance labeling must be performed by an inspection agency accredited in this area.
3. Revising Sections 3.2.1 and 4.2.2 to include a test protocol documenting durability of product to determine if and when reapplication of the FRC is required. The test protocol needs to address flexibility, adhesion and life expectancy of the coating. The term "life expectancy"

needs to be removed from the criteria and, instead, these sections need to address the performance of the coating concerning the need for reapplication. Staff is of the opinion that the test protocol needs to document that reapplication of the coating is not required for the duration of the product's intended use.

4. Revising Section 4.2.1 to clarify testing of different wood species and panel thicknesses, and to define types of panels to be tested.
5. Revising Section 5.2.1.3 to clarify the need for periodic fire testing of finished panels to verify compliance with Section 4.1 of the criteria.

Staff considers items 2 and 3 above as the primary items that need resolution.

Thank you for consideration of the above items.