

*AMERICAN WOOD PROTECTION ASSOCIATION***2009-2010 Executive Committee:**

Bessie M. Woodward, *Chair*
 Richard J. Ziobro, *Vice Chair*
 James A. Brient, *Past President*
 William Abbott
 Todd P. Greer
 Michael Johnson
 Pascal Kamdem
 Kenneth R. Laughlin
 Martin P. Riehemann
 Susan Thomason
 Edward D. Williams, Jr.

**Corporate Office:**

100 Chase Park South Suite 116
 Birmingham, AL 35244-1851

Telephone: 205-733-4077
 Facsimile: 205-733-4075

Mailing Address:

PO Box 361784
 Birmingham, AL 35236-1784

E-mail: email@awpa.com
 Website: www.awpa.com

2009-2010 Officers:

Bessie M. Woodward
President
 Richard J. Ziobro
First Vice President
 Edward D. Williams, Jr.
Second Vice President
 Kenneth R. Laughlin
Third Vice President
 Randy Deweese
Treasurer
 Colin McCown
Executive VP & Secretary

VIA EMAIL ONLY

Tuesday, 19 May 2009

Michael O'Reardon, P.E.
 ICC Evaluation Service, Inc.
 900 Montclair Road, Suite A
 Birmingham, AL 35213
 email: mo'reardon@icc-es.org

RE: Proposed Acceptance Criteria for Subterranean Termite Baiting Systems (AC381)

Dear Michael,

Regarding the Proposed AC381, please accept the following comments:

1. At line 7, IBC 2304.11.6 is only applicable where the "hazard of termite damage is known to be very heavy", which makes sense because most of the other applications in 2304.11 require protection from decay. I assume that the proponent is aware of this restriction.
2. Such a baiting system may provide protection from termites, but would seem to afford no protection from decay fungi, so the AC and resulting ESR should contain language stating that this particular method shall be used in conjunction with a method of protection against decay where required by the applicable code.
3. Lines 8 through 10 refer to the entire Termite Protection Section(s) of the IRC, but because the subject of this Acceptance Criteria appears to be a chemical baiting system, it would seem that the appropriate code reference is IRC R318.2 (R320.2 in the 2006 IRC).

If you have any questions or require additional information, please do not hesitate to contact me.

Best regards,

Colin McCown, Executive Vice President
 American Wood Protection Association, Inc.

Comments for ICC-ES June 2009 Hearings

Document: ICC-ES AC381-0609-R1

Reviewers: Mark Gilligan SE, SECB (510-548)-8029
mark@gilligan.name

Summary of Issue: Proposed to eliminate the requirement for treated lumber by installing a termite baiting system that must be maintained.

Code Provisions:

IBC 2304.11.6 Requires treated lumber.

IBC 2603.8 Requires certain plastics be protected from termites.

Discussion:

IBC 2304.11.2 also requires wood be treated to provide resistance against decay. Thus unless the issue of decay resistance is addressed this proposed system is moot in new construction.

If this product is being proposed as an alternate to the treated wood required in the IBC then the evaluation reports should note that it is still necessary to satisfy the code requirement for protection against decay.

Bait systems apparently do not prevent termite infestations but rather provide evidence of infestation if they are monitored thus allowing treatment for the infestation. This will only work if the baiting system and the building is continually monitored.

The requirement in section 4.11.4 that only requires that the system be monitored for 12 months does not seem to address the long term problem. In addition allowing the owner to verify that the system is working seems questionable.

The existing code provisions do not require that the termite protection be actively maintained but the proposed system would require that it be actively maintained. This is at odds with typical code philosophy. To insure that the service agreement mentioned in section 6.4.2 is maintained there should be a mechanism to notify the building official if the service agreement is not maintained. In addition require that this requirement be recorded with the property deed.

What happens if the baiting system is not maintained? Is the building then deemed to be no longer in compliance with the code?

Recommendations:

Since the proposed system does not address decay resistance the evaluation report needs to make it clear that the user should either verify that decay resistance is not required or that the requirement be provided by some other means.

Some provision needs to be made to give the building official assurance that the necessary monitoring will occur.