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To: ICC-ES Evaluation Committee
From: Michael O'Reardon
Date: January 28, 2010
Subject: Proposed Acceptance Criteria for Wood-based Exterior Composite Trim Treated with Zinc Borate (ZB) Preservative by a Non-Pressure Process, Subject AC424-0210-R1 (MO/MR)

MEMO

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

- Louisiana-Pacific Corp. (Lance Olson, dated January 14, 2010).
- Composite Panel Association (Gary L. Heroux, dated January 17, 2010).
- APA [Borjen ("B.J.") Yeh, Ph.D., P.E., dated January 18, 2010].

The public comments provided proposed revisions to the criteria to address concerns they had with the scope of the criteria, product definition, testing procedures, and minimum retentions for zinc borate (ZB).

The Louisiana-Pacific Corporation comments requested that the title of the criteria be revised to use the term "Lignocellulosic Fiber," to better define the scope of the product covered by the criteria. They recommended that the product covered by this criteria be evaluated to the same requirements as those noted in ANSI A135.6, as referenced in the 2009 IRC, since the only difference is the product thickness. They also recommended that the product thickness be removed from the product definition (Section 1.4.1), which would also require deletion of Table 1.

Louisiana-Pacific Corporation and APA both commented on the minimum retention of ZB proposed by the criteria as being less than that required by AWPA Standard T1, Section J. The proposed criteria requires decay testing in Section 4.9 to document performance in AWPA use category UC3A, coated millwork, siding and trim exposed to all weather cycles, not exposed to prolonged wetting. Staff recommends removal of minimum retention from Table 2 pending submittal of test data documenting performance at the minimum retention recommended by the proponent.

Additional comments from APA requested that the new criteria clearly exclude products covered under AC321, and that the number of test samples for testing noted in the criteria be increased from three to ten per thickness to provide greater confidence in the mean test results.

The comment from the Composite Panel Association noted that they are currently developing a standard for hardboard trim, and recommended that the criteria be delayed pending development of this standard. They expressed an interest in development of this criteria and

invited ICC-ES staff participation in the development of their proposed ANSI standard for hardboard trim.

The staff considers that the above comments need to be addressed in the criteria and note that additional time is needed to discuss these comments with the proponent of the criteria and other interested parties. The criteria will be revised for submittal at a future committee meeting.

Thank you for consideration of the above items.