



FLAMEDXX, LLC

January 19, 2010

Michael O'Reardon, P.E.
ICC ES Southeastern Regional Office
900 Montclair Road
Birmingham, AL 35213-1206

Re: AC66

Dear Mr. O'Reardon:

As a proponent for AC405, I request that the ICC include a provision to AC66 to perform an ASTM E-84 extended test on all FRT plywood after the panel has been subjected to extended high humidity and high heat after a similar provision in the proposed AC405. We know that the absence of such a provision is a serious defect in AC66's current protocol and creates a dangerous life and death situation for the public that only increases over time.

Such a provision would assure all alternative applicants to AC66 that the ICC is treating all fire retardant providers fairness and performance. More importantly, such a provision would assure the public that the fire retardant chemicals are still in the plywood and have not dissipated over time creating a false sense of protection. We agree with such a provision for AC 405 and think it only logical that the same would be included in AC66. Thank you for your consideration of this matter.

Respectively,

A handwritten signature in black ink that reads 'Patrick M. Thompson'. The signature is written in a cursive, flowing style.

Patrick M. Thompson
CEO

P O Box 280448 | Nashville, TN 37228 | Ph 615-297-2000 | Fax 615-297-2001

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Mr. Michael O'Reardon, P.E.
Regional Manager, ICC-ES

Response to Proposed Revisions of AC 66
ICC-ES AC66-0210-R1

Dear Mike,

Hoover Treated Wood Products is in support of the revisions to AC66. The committee asks for input regarding the current revisions of ASTM standards. Following are comments on ASTM D3201, E 84, and D2798.

Hygroscopicity Properties, ASTM D3201

The 2007 revisions do not materially change the test parameters and re-testing should not be required. In making the revisions, ASTM D7.07 subcommittee considered the current practice and past testing as reported by manufacturers. The minimum number of specimens was added to provide additional clarity to the standard.

Surface Burning Characteristics, ASTM E 84

The revisions to E 84 were minor clarifying and editorial revisions and would not be anticipated to affect results of testing Fire Retardant Treated Wood (FRTW). In particular, recent revisions have been regarding the mounting of pvc pipes, tapes, foam, and materials which are not the of sufficient size to be the full width of the tunnel. ICC-ES should be aware the ASTM Committee E5 and D7 are working on developing a standard which address the modification of E84 as found in ICC IBC 2303.2 to include extending the test to 30 minutes and limiting the surface spread of flame to 10.5' beyond the centerline of the burners. The proposed standard is not written exclusively for FRTW, but could be applied to any material. With adoption of a standard, it is planned that code modifications would be proposed to reference this standard for FRTW.

Accelerated Weathering , ASTM D2898

Several new methods have been added to the standard to recognize methodologies currently in practice. The previous methods continue to be included in the standard with no substantive changes. Re-testing to meet the qualifications would not be required. It is suggested that Section 3.13 of the proposed AC66 be revised to reference the specific method of weathering desired to be used.

Comments were also solicited regarding Section 5- Quality Control, of the criteria. A revision of this section is greatly needed. Unlike most AC's developed under the ICC, this section includes information which a certifying agency would develop with a manufacturer.

A very brief review of the section suggests the following changes:

5.1 – Fourth paragraph, delete the third sentence starting with, “Such Parameters include ...”

Delete section 5.2.2

Delete section 5.2.3.1

Delete section 5.2.3.3
Delete section 5.2.3.4
Delete section 5.2.3.5
Delete section 5.2.4
Delete section 5.3.1
Delete section 5.3.2
Delete section 5.3.4
Delete section 5.4 and all sub headings

Hoover Treated Wood Products Inc. will be happy to work with ICC-ES staff to develop revisions to this section and further streamline AC66.

Sincerely,

A handwritten signature in black ink that reads "Steven J. Hill". The signature is written in a cursive style with a large, stylized initial "S".

Steven Hill
Technical Manager
Hoover Treated Wood Products Inc.