



HOOVER
TREATED WOOD PRODUCTS, INC.
154 Wire Road • Thomson, GA 30824
TEL (706) 595-5058 / FAX (706) 595-1326
Web Address: <http://www.FRTW.com>

Please respond to:
1225 North Halifax Avenue
Daytona Beach, Florida 32118
(706) 755-4811

May 1, 2008

Ms. Rosario Marin
Chairman
California Building Standards Commission
2525 Natomas Park Dr., Suite 130
Sacramento, CA 95833

Ms. Marin:

Attached are three comments for consideration by the Building Standards Commission. While we agree with the proposal to delete the outdated definition carried over from the previous edition of the California Building Code we disagree with the need to retain the last sentence and its incorporation into Chapter 6. We have outlined our reasons on the comment form. In addition, if such wording was necessary Section 602.2, 602.3 and 602.4 are not the appropriate place. The code has many uses for FRTW. It is recognized by the other users of the International Building Code as combustible without the additional language. It is superfluous.

The comments are designated as Hoover Treated Wood Products # 1, # 2, and # 3. Number 1 and 2 should be considered together and Number 2 and 3 also, needs to be considered together.

It should be noted that the Code Advisory Committee recommended disapproval of the added sentence to Section 602.2, 602.3 602.4 at their January 18 meeting. The original Express Terms for the deletion of the definition had the last sentence recommended for deletion so the advisory committee recommended approval.

If you or any members of the committee have any question or need additional information, please call or e-mail (jholland@frtw.com).

Sincerely yours



Joseph T. Holland, III

Enclosures:

STATE OF CALIFORNIA
STATE AND CONSUMER SERVICES AGENCY
CALIFORNIA BUILDING STANDARDS COMMISSION
2525 NATOMAS PARK DR., SUITE 130
SACRAMENTO, CA 95833
(916) 263-0916 Phone
(916) 263-0959 Fax
Email: BSC@dgs.ca.gov

Office Use Item No. _____

Hoover Treated Wood Products Comment # 1

PARTICIPATION COMMENTS FOR THE NOTICE DATED MARCH 18, 2008
Written comments are to be sent to the above address.

WRITTEN COMMENT DEADLINE: MAY 12, 2008

Date: May 1, 2008

From: Joseph Holland
Name (Print or type)

Hoover Treated Wood Products, Inc
Agency, jurisdiction, chapter, company, association, individual, etc.

1225 North Halifax Avenue Daytona Beach Florida 32118
Street City State Zip

We do not agree with:

The Agency proposed modifications As Submitted on Section No. 202.

and request that this section or reference provision be recommended:

Approved Disapproved Held for Further Study Approved as Amended

to the proposing state agency.

Suggested Revisions to the Text of the Regulations:

Delete the sentence being proposed to be relocated to Section 602.2, 602.3 and 602.4

~~**FIRE-RETARDANT TREATED WOOD [SFM]** is any wood product impregnated with chemicals by a pressure process or other means during manufacture, and which, when tested in accordance with ASTM E 84-05 for a period of 30 minutes, shall have a flame spread of not over 25 and show no evidence of progressive combustion. In addition, the flame front shall not progress more than 10 1/2 feet (3200 mm) beyond the center line of the burner at any time during the test. Materials that may be exposed to the weather shall pass the accelerated weathering test and be identified as Exterior type, in accordance with ASTM D 2898-94 and ASTM D 3201-94. Where material is not directly exposed to rainfall but exposed to high humidity conditions, it shall be subjected to the hygroscopic test and identified as Interior Type A in accordance with ASTM D 2898-94 and ASTM D 3201-94. All materials shall bear identification showing the fire performance rating thereof. Such identifications shall be issued by an approved agency having a service for inspection of materials at the factory. (Relocated to 602.2, 602.3 and 602.4) Fire retardant treated wood shall not be construed as "noncombustible."~~

Reason: [The reason should be concise. If the request is for "Disapproval," "Further Study," or "Approve As Amend", identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

The International Building Code is used in all 50 states. This change would only appear in the CBC. There is no confusion as to the combustibility of fire-retardant-treated wood. The code is very specific. There are already many references to FRTW being a combustible material. Examples:

Section 603, Combustible materials in Type I and Type II Construction
Section 717.5, Combustible materials in concealed spaces in Type I and Type II construction

Section 1406, Combustible Materials on the Exterior Side of Exterior walls and Sections 1406.2.2 and 1406.2.3
Section 2303.2.6 Type I and II construction applications.

The code without the recommended language is clear that FRTW is a combustible material.
The statues require changes meet all of the nine points listed in 18930. The Code Advisory Committee found at least three points where the proposed language did not meet the criteria.

In addition our position is the amendment fails to meet:

(3) The public interest requires the adoption of the building standards.

(7) The applicable national specifications, published standards, and model codes have been incorporated therein as provided in this part, where appropriate.

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Hoover Treated Wood Products Comment # 2

PARTICIPATION COMMENTS FOR THE NOTICE DATED MARCH 18, 2008
Written comments are to be sent to the above address.

WRITTEN COMMENT DEADLINE: MAY 12, 2008

Date: May 1, 2008

From: Joseph Holland
Name (Print or type)

Hoover Treated Wood Products, Inc
Agency, jurisdiction, chapter, company, association, individual, etc.

1225 North Halifax Avenue Daytona Beach Florida 32118
Street City State Zip

We do not agree with:

The Agency proposed modifications As Submitted on Section No. 602.2, 602.3, and 602.4.

and request that this section or reference provision be recommended:

Approved Disapproved Held for Further Study Approved as Amended

to the proposing state agency.

Suggested Revisions to the Text of the Regulations:

Disapprove. The Building, Fire and Other (BFO) Codes Advisory Committee recommended disapproval at its January 18, 2008 meeting

602.2 Types I and II. Type I and II construction are those types of construction in which the building elements listed in Table 601 are of noncombustible materials, except as permitted in Section 603 and elsewhere in this code.

~~(Relocated from chapter 2 definition of Fire-retardant-treated wood) [SFM] Fire-retardant-treated wood shall not be construed as "noncombustible."~~

602.3 Type III. Type III construction is that type of construction in which the exterior walls are of noncombustible materials and the interior building elements are of any material permitted by this code. Fire-retardant-treated wood framing complying with Section 2303.2 shall be permitted within exterior wall assemblies of a 2-hour rating or less.

~~(Relocated from chapter 2 definition of Fire-retardant-treated wood) [SFM] Fire-retardant-treated wood shall not be construed as "noncombustible."~~

602.4 Type IV. Type IV construction (Heavy Timber, HT) is that type of construction in which the exterior walls are of noncombustible materials and the interior building elements are of solid or laminated wood without concealed spaces. The details of Type IV construction shall comply with the provisions of this section. Fire-retardant-treated wood framing complying with Section 2303.2 shall be permitted within exterior wall assemblies with a 2-hour rating or less. Minimum solid sawn nominal dimensions are required for structures built using Type IV construction (HT). For glued laminated members the equivalent net finished width and depths corresponding to the minimum nominal width and

depths of solid sawn lumber are required as specified in Table 602.4. ~~(Relocated from chapter 2 definition of Fire-retardant-treated wood) [SFM] Fire-retardant-treated wood shall not be construed as "noncombustible."~~

Reason: [The reason should be concise. If the request is for "Disapproval," "Further Study," or "Approve As

Amend”, identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

The proposed revisions to these sections are related to the definition for fire-retardant-treated wood carried over from the previous edition of the California Building Code. That definition was in the 1997 UBC. The proponent modified the UBC definition by adding the sentence, “Fire-retardant-treated wood shall not be construed as “noncombustible.””

Although it is recognized by the proponent that the definition is not necessary because of other provisions in the 2007 CBC, they have retained the last sentence and moved it to the cited sections. The additional language is not necessary as the code adequately conveys that FRTW is combustible in other sections of the code. While not an all inclusive list the following are examples of sections where the code is referring to the use of combustible materials:

Section 603, Combustible materials in Type I and Type II Construction

Section 717.5, Combustible materials in concealed spaces in Type I and Type II construction

Section 1406, Combustible Materials on the Exterior Side of Exterior walls: 1406.2.2, 1406.2.3

Section 2303.2.6 Type I and II construction applications.

The code without the recommended language is clear that FRTW is a combustible material.

The statutes require changes meet all of the nine points listed in 18930. The Code Advisory Committee found at least three points where the proposed language did not meet the criteria.

In addition our position is the amendment fails to meet:

(3) The public interest requires the adoption of the building standards.

(7) The applicable national specifications, published standards, and model codes have been incorporated therein as provided in this part, where appropriate.

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Hoover Treated Wood Products Comment # 3

PARTICIPATION COMMENTS FOR THE NOTICE DATED MARCH 18, 2008
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WRITTEN COMMENT DEADLINE: MAY 12, 2008

Date: May 1, 2008

From: Joseph Holland
Name (Print or type)

Hoover Treated Wood Products, Inc
Agency, jurisdiction, chapter, company, association, individual, etc.

1225 North Halifax Avenue Daytona Beach Florida 32118
Street City State Zip

We do not agree with:

The Agency proposed modifications As Submitted on Section No. 202

and request that this section or reference provision be recommended:

Approved Disapproved Held for Further Study Approved as Amended

to the proposing state agency.

Suggested Revisions to the Text of the Regulations:

Delete all of the current definition including the last sentence.

~~**FIRE RETARDANT TREATED WOOD (SFM)** is any wood product impregnated with chemicals by a pressure process or other means during manufacture, and which, when tested in accordance with ASTM E 84-05 for a period of 30 minutes, shall have a flame spread of not over 25 and show no evidence of progressive combustion. In addition, the flame front shall not progress more than 10 1/2 feet (3200 mm) beyond the center line of the burner at any time during the test. Materials that may be exposed to the weather shall pass the accelerated weathering test and be identified as Exterior type, in accordance with ASTM D 2898-94 and ASTM D 3201-94. Where material is not directly exposed to rainfall but exposed to high humidity conditions, it shall be subjected to the hygroscopic test and identified as Interior Type A in accordance with ASTM D 2898-94 and ASTM D 3201-94. All materials shall bear identification showing the fire performance rating thereof. Such identifications shall be issued by an approved agency having a service for inspection of materials at the factory. (Relocated to 602.2, 602.3 and 602.4) Fire retardant treated wood shall not be construed as "noncombustible."~~

Substitute:

TREATED WOOD. Wood and wood based materials that use vacuum-pressure impregnation processes to enhance fire retardant or preservative properties.

Fire-retardant-treated wood. Pressure-treated lumber and plywood that exhibit reduced surface burning characteristics and resist propagation of fire.

Preservative-treated wood. Pressure-treated wood products that exhibit reduced susceptibility to damage by fungi, insects or marine borers.

Reason: [The reason should be concise. If the request is for "Disapproval," "Further Study," or "Approve As Amend", identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

The definition proposed for deletion was in the 1997 UBC. The proponent modified the UBC definition by adding the sentence, "Fire-retardant-treated wood shall not be construed as "noncombustible."."

The sentence is not necessary as the CBC already recognizes that FRTW is combustible. Examples:

Section 603, Combustible materials in Type I and Type II Construction

Section 717.5, Combustible materials in concealed spaces in Type I and Type II construction

Section 1406, Combustible Materials on the Exterior Side of Exterior walls: 1406.2.2, 1406.2.3

Section 2303.2.6 Type I and II construction applications.

Our proposed amendment was adopted by the International Code Council during the 2006-2007 revision cycle and is published in the 2007 Amendments to the 2006 International Building Code. The amendment meets the intent of Criteria number 7. The new definition specifically states the flame spread is reduced signifying the material is combustible.