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Intl Barrier Technology Comment on Proposed Code Change S201 – 09/10

Regarding proposed code change S201-09/10, International Barrier Technology concurs that the language of the code regarding fire-retardant-treated wood (FRTW) could be changed, but not in the way the current proposal reads.

While the change's proponents believe the definition of FRTW should be more closely tied to a method of manufacturing – in this case, narrowly defined as pressure treated – we believe the definition should be completely decoupled from a method of manufacturing, and reflect instead performance criteria.

Simply stated, it should not necessarily matter how fire-retardant-treated wood is made, but rather how it performs in the intended application. The ICC, moreover, already has in place time-tested acceptance criteria that evaluate fire-retardant-treated wood produced under a variety of manufacturing techniques, including: surface applied fire-retardant coatings (ICC AC-363); inert, inorganic laminates (ICC AC-264); and, an AC under development for factory applied fire retardant coatings (ICC AC-405). The development and ratification of additional ICC acceptance criteria is likely as new technology for providing fire resistance to wood products is created. These acceptance criteria are much better indicators of the suitability of a material to be used where fire rated materials are required by code than a specified manufacturing technique.

Petitioners for the proposed change in the definition of FRTW cite selected performance criteria (e.g., listed flame spread index, flame front progression) but ignore other criteria that may be important in determining if a fire-rated wood product is appropriate for specific uses under the code (e.g., fire performance after aging in high temperature and humid environments; fire resistant assembly applications; fire-rated roof deck assemblies; thermal barrier for foam plastics; etc). Focusing on how the wood is treated, versus focusing on tested product performance to a set of pre- approved acceptance criteria, is a much too narrow and incomplete way to determine whether or not a product is suitable for use in code mandated applications.

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Barrier would propose that an edit to the definition to FRTW be more along the lines of the following:

Part I – IBC Structural

1. Revise as follows:

2303.2 Fire-retardant treated wood. Fire retardant-treated wood (FRTW) is a product produced by pressure impregnation, or other means of manufacture, that affords performance standards required by whatever ICC-ES Acceptance Criteria is deemed appropriate for the application under consideration. FRTW, among other performance criteria, shall have a listed flame spread index of 25 or less and show no evidence of significant progressive combustion when the test is continued for an additional 20-minute period. The flame front shall not progress more than 10.5 feet (3200mm) beyond the centerline of the burners at any time during the test.

2. Delete without substitution:

2303.2.1, 2303.2.2, and 2303.2.3

Part II – IRC Building/Energy:

1. Revise as follows:

R802.1.3 Fire retardant treated wood). Fire retardant treated wood (FRTW) is a product produced by pressure impregnation, or other means of manufacture, that affords performance standards required by whatever ICC-ES Acceptance Criteria is deemed appropriate for the application under consideration. FRTW, among other performance criteria, shall have a listed flame spread index, of 25 or less and show no evidence of significant progressive combustion when the test is continued for an additional 20-minute period. The flame front shall not progress more than 10.5 feet (3200mm) beyond the centerline of the burners at any time during the test.

Submitted by:

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