

APPENDIX I: REAFFIRMATION REQUIREMENT GUIDELINES

Maintained by Subcommittee P-1

This Appendix to AWPA's Technical Committee Regulations is not an AWPA Standard. It is a non-mandatory guidelines document presented to enable the user to understand the basic testing requirements for wood protection systems and to assist the AWPA Technical Committees in the development of AWPA Standards. The testing of products in accordance with this Appendix does not constitute conformance with any AWPA Standard. No product can be considered to conform with an AWPA Standard until it has been subjected to complete technical review and voting by AWPA's Technical Committees, and procedural review and final action by the AWPA Executive Committee pursuant to the AWPA Technical Committee Regulations.

INTRODUCTION

All AWPA Standards in the Book of Standards shall be reviewed, revised when appropriate and reaffirmed by normal Subcommittee Balloting Procedures every five years. This is presented in Paragraph 6.2 **Custodial Responsibility for Standards** in the Technical Committee Regulations. The Subcommittee(s) identified as having jurisdiction over a Standard shall be responsible to assign, carry out and complete the review process as described herein.

The objective of the reaffirmation process is to provide a consistent procedure by which all the preservatives, preservative systems, or analytical methods for preservative solutions and treated wood, presently in use, can be evaluated and reviewed on a regular basis. It is not intended to be an entire re-evaluation process levied on existing and commercially used systems similar to those required for new preservative systems or analytical methods.

This Guideline will be presented in two parts. Part I will address the preservative chemicals and systems in existence and presently being commercially used. Part II provides guidelines specific to the analytical methods and assessment standards.

Part I

EXISTING WOOD PRESERVATIVES

This reaffirmation process has several basic requirements:

1. Review the existing Standard as printed in AWPA Book of Standards for revisions, editorial corrections and other necessary modifications.
2. Compile and report on laboratory, field data or inspection reports since the last reaffirmation.
3. Report performance records of products treated and in service using the preservative or system.
4. Review the present EPA registration or restrictions that may affect the continued use of this material.
5. Determine if new information will be required for future use due to changes in service exposure requirements.

The Reaffirmation Task Force will present this information to the members of Subcommittee P-1 and any other P-Subcommittee(s) having jurisdiction over the Standard being presented for reaffirmation. Reaffirmation proposals shall meet the forty-five (45) day advance notice shall be followed as defined in the Technical Committee

Regulations.

AWPA Standards for preservative formulations shall be reviewed at least every five years and amended, reaffirmed, or deleted, as appropriate. Failure to meet the five year review requirement will result in notice to the proponent from the Subcommittee with jurisdiction over the Standard that, if the required reaffirmation is not completed within two years, there will be just cause to remove the preservative formulation from the Book of Standards. This will be determined by action of the General Preservative Committee or Executive Committee.

REVIEW EXISTING STANDARD

The existing Standard shall be reviewed to ensure the description of the product, biocide concentration levels, component listing (when applicable) including acceptable minimum and maximum concentrations are accurate. All standard references for analytical procedures or methods shall be included in the Standard, where appropriate. These analytical Standards, although not normally under the jurisdiction of the same Subcommittee, should also be reviewed to verify the use and accuracy of the methods as published.

EFFICACY TEST DATA AND REPORTS

Updates of any ongoing or continuing laboratory, field tests or inspection results for products in service and available since the initial adoption or last reaffirmation of the Standard shall be assembled. It is imperative that no pertinent data be knowingly or purposefully withheld from the Subcommittee(s) during the reaffirmation process. Testing or evaluation for properties in addition to those submitted in the initial new preservative proposal data package or in past reaffirmation procedures which have been completed shall be made available as a part of the reaffirmation procedure data and reports.

Failure to comply with this requirement may be just cause for a Standard reaffirmation proposal to be rejected, or the Standard to be automatically removed from the Book of Standards as determined by action of the General Preservatives Committee or Executive Committee.

PRODUCT PERFORMANCE REPORTS

Reaffirmation proposals shall report or provide documented records of the performance of products treated with the preservative or preservative systems being

considered for reaffirmation when such information is available. Suitable forms of documentation may include: a) User or Consumer verification or affirmation of successful service performance, and/or b) Inspection reports from authorized third-party entities with experience in the use of the treated products, applications and installations using the preservative system.

Negative reports or documents which exhibit non-characteristic or unsatisfactory preservative performance shall not be withheld or intentionally altered. Negative claims may be addressed with supplementary information defining the reason for such performance along with recommendations to modify or correct the application or procedural malfunctions determined to be the cause. These recommendations, when presented, shall be based on sound scientific evidence or data. The determination of supporting material's acceptability shall be assessed by the Subcommittee(s) having jurisdiction of the Standard. All pertinent information should be thoroughly reviewed by the Task Force working on the reaffirmation process before it is presented to the entire Subcommittee(s) for consideration.

MSDS AND EPA REGISTRATIONS

Preservative reaffirmation information shall include the most current Material Safety Data Sheet for the preservative and / or wood products treated with the preservative system. The reaffirmation Task Force or Subcommittee is encouraged to provide information having current review or revision status indicated within the five-year reaffirmation period, but shall not allow an MSDS to be accepted if its revision and review date exceeds ten (10) years.

The status of the registration of the preservative with the Environmental Protection Agency (EPA) and any individual State requirements for acceptance and use shall also be provided with the reaffirmation proposal data package. Of particular interest would be any changes or modifications that have occurred since the last reaffirmation or approval of the preservative. These should be clearly indicated and supported by information or data to verify the change.

EXTENSION OF EXPOSURE CONDITIONS

There may be occasions when an additional service exposure condition is desirable following the initial Standard proposal, or when natural conditions in an exposure environment alter the performance of treated wood products in use exposure categories previously approved for the preservative or system. An example is the Formosan termite attack on wood structures where no previous efficacy data is available on the existing preservatives for this insect.

Under these circumstances, data may be presented a.) In response to a specific instruction from the Executive Committee to the Subcommittee(s) having jurisdiction of the Standard involved, or b.) At the option of the Task Force or proponent of the preservative reaffirmation proposal, to extend the use category classifications under which the

preservative can be utilized. This data submission shall follow the forty-five (45) day notice for distribution; or the twenty (20) day notice otherwise. Guidelines for the information and testing in these applications can be found in the AWPA Book of Standards Technical Committee Regulations, *Appendix A – Data Requirement Guidelines for Listing Wood Preservatives in the AWPA Standards*.

Only those specific areas applicable to the exposure conditions being studied shall be requested.

Part II

ANALYTICAL STANDARDS REAFFIRMATION

The General Preservatives Committee also has jurisdiction over the Analytical or "A-Standards" in the Book of Standards. The reaffirmation requirements for these Standards shall be considered separately from the guidelines for the existing Preservative Chemicals and Systems given under Part I. Jurisdiction of the A-Standards may be held by the P-5 Subcommittee, Methods of Chemical Analysis of Preservatives, by an individual P-Subcommittee directly associated with the analytical methods contained in that Standard, or a combination of P-Subcommittees. This information is given at the beginning of each of the Analytical Standards.

The basic areas of interest in the reaffirmation process of the A Standards will be as follows:

1. Review the existing Standard as printed in the AWPA Book of Standards for revisions, editorial corrections and modifications that are necessary.
2. Examine the content of the Standard to determine if a reorganization of multiple test methods is appropriate.
3. Revise and update as necessary the reagents, apparatus listing or equipment to be used.
4. Report and address any request for changes or clarification of the procedure or text of the Standard.
5. Review references to other Standard Methods for accuracy, availability and latest revisions.
6. Report on new methods and procedures that have been developed to analyze the preservative or product.
7. Confirm the method includes an acceptable precision and bias statement.

The information shall be presented to the P-1 Subcommittee members and other P-Subcommittee(s) having jurisdiction over the proposed Standard for reaffirmation. This proposal shall meet the forty-five (45) day deadline requirements as stated in the Committee Regulations. Standards being considered for reaffirmation which require major or substantive change shall be accompanied by a data submission to satisfy the requirements of the Subcommittee(s) having jurisdiction.