

AMERICAN WOOD PROTECTION ASSOCIATION



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VIA EMAIL ONLY

Wednesday, 24 June 2009

Elaina Jackson
The Pacific Wood Preserving Companies
5601 District Blvd.
Bakersfield, CA 93313
email: elaina.jackson@pacificwood.com

RE: May 25, 2009 Request for interpretation of AWPA Standard P9, Section A

Dear Elaina,

Pursuant to your request for interpretation of the above captioned AWPA Standard, a panel consisting of Subcommittee P-3 Chair Navnit Upadhyay, Preservatives General Committee Chair Futong Cui, and myself was formed to address your request. Unfortunately, the interpretation panel was unable to achieve consensus, and we are therefore referring the aforementioned section of the Standard to Subcommittee P-3 for consideration at its next meeting. By copy of this letter to the P-3 Chair and the P-General Chair, the Subcommittee shall consider this request and work towards clarifying the Standard as it deems necessary. Please note that there are two P-3 task groups currently working on issues related to your questions, and a number of proposals pertaining to this issue have been and probably will be submitted to AWPA for the purposes of clarifying this section of the Standard. These issues will ultimately be resolved by the subcommittee.

The panel agreed that biodiesel is not a petroleum distillate and cannot be used as the solvent in a P9-A solution, and also agreed that cosolvents are not limited to petroleum distillates. Cosolvents must meet the requirements of Notes 1 and 2 of P9-A, which does not define the nature or percentage of cosolvents

or auxiliary solvents. The chemical and physical properties of biodiesel may vary based on the feed stock used. These variations may not affect specifications for biodiesel fuel, but have the potential to affect the properties of the solvent as a whole. Therefore, the Standard may or may not preclude the use of biodiesel as a cosolvent, since we do not know if all biodiesels meet the specifications which apply to cosolvents in the Standard, nor is it known whether or not a treating solution made up of a petroleum distillate and biodiesel cosolvent would meet the requirements of Standard P9-A.

On behalf of Subcommittee P-3 Chair Navnit Upadhyay and Preservatives General Committee Chair Futong Cui, I thank you for your continued support of AWPA.

Best regards,

A handwritten signature in blue ink, appearing to read 'Colin McCown', with a long horizontal flourish extending to the right.

Colin McCown, Executive Vice President
American Wood Protection Association

May 25, 2009

Mr. Colin McCown
American Wood Protection Association

Subject: Request for Interpretation

Sent Via Email

Dear Colin,

I would like to formally request an interpretation from the AWPAs as to whether or not biodiesel (in any form or percentage) may be used as a cosolvent and/or auxiliary solvent and remain in compliance with the P9-06 Type A standard, regardless of whether or not it meets the physical characteristic requirements of the standard. In other words, assuming that the biodiesel in question meets the physical characteristics (viscosity, distillation range, flash point, solvency, etc.), can it be used in compliance with the standard? The "Hydrocarbon" and "Petroleum distillate" language would indicate that biodiesel would not be acceptable, but there is disagreement on this issue, and this is my reason for requesting an official interpretation.

For clarity, I would like this interpretation based upon the existing standard (excluding any proposed changes that may have occurred at the San Antonio meeting).

I believe a response to this request would be required within 30 days from the date of request. Please let me know if you need any additional information.

Best regards,

Elaina Jackson