

# American Wood-Preservers' Association

## *2006-2007 President*

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## *Executive Vice President*

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Wednesday, 02 August 2006

Charles R. Faulds, P.E.  
Senior Vice President, Treating Division  
Texas Electric Cooperatives  
PO Box 510  
Jasper, TX 75951-0510

## **RE: July 19, 2006 Request for Interpretation of AWPA Standard T1, Section/Table 8.4.1**

Dear Mr. Faulds:

Pursuant to your request for interpretation of the above captioned AWPA Standard, a panel consisting of Subcommittee T-4 Chair Cliff Eddington, Treatments General Committee Chair Andrew Zahora, and myself was formed to address your request. Our official response is as follows:

The panel has determined that if a process is not expressly limited in an AWPA Standard, it does not mean that it is implicitly permitted without any limitation whatsoever. In this particular case, the absence of language prohibiting the steam conditioning of poles for treatment with CCA does not mean that steam conditioning can be performed and the poles would still conform to the requirements of the Standard. The construction of the table is such that the allowed process and parameters are first listed, then the limitations on that process are shown below that entry.

While we understand that this response does not agree with your interpretation of the Standard, this was the unanimous decision of the panel. It is also understood that you have prepared a proposal and data package for the consideration of Subcommittee T-4 which seeks to expressly permit this practice. All proposals which improve the quality and integrity of AWPA Standards are always appreciated.

On behalf of Subcommittee T-4 Chair Cliff Eddington and Treatments General Committee Chair Andrew Zahora, I thank you for your continued support of AWPA.


Best regards,

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

Colin McCown, Executive Vice President  
American Wood-Preservers' Association



## Texas Electric Cooperatives

Your Touchstone Energy® Partner 

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July 19, 2006

Mr. Colin McCown  
Executive Vice President  
American Wood Preservers' Association  
P.O. Box 361784  
Birmingham, Alabama 35236-1784

Re: Request for Clarification

Dear Mr. McCown:

Pursuant to American Wood Preservers' Association (AWPA) Technical Committee Regulation 14.1, Texas Electric Cooperatives, Inc., (TEC), hereby requests a formal interpretation of an AWPA Standard. TEC is requesting clarification of the fact that AWPA Standards do not prohibit steam conditioning prior to treatment with CCA.

In the AWPA Standards, section 8.4, Poles, is part of the T1-05 Use Category System describing Processing and Treatment. Section 8.4.1, Processing Limitations, states "The processing limitations for solid wood poles undergoing preservative treatment by pressure process are listed in table 8.4.1." In Table 8.4.1 the Conditioning methods are listed in column form along with pole species. In the conditioning column, there is no listing explicitly for steam conditioning prior to CCA treatment. Therefore since this limitation is not listed in table 8.4.1, it is authorized. However, there is one listing authorizing steaming for thawing, which speaks to adequate cooling prior to treatment to prevent premature fixation, and seems to speak to poles already conditioned.

TEC currently only uses creosote and we use a segregated steaming system. That is we steam condition poles in cylinders dedicated for that purpose, remove them from those cylinders, and introduce the poles into a cylinder dedicated for creosote treatment. We are seeking this change because of the current creosote restrictions. We wish to have some of our poles CCA treated by others so that we can supply our customers. We may consider installation of a dedicated CCA cylinder next year.

We have talked with many in our industry who are of the opinion that steam conditioning is acceptable prior to CCA treatment. It appears that dry kiln conditioning simply became the default conditioning method because of the

tremendous volume of dimension material historically treated with CCA and required dry kiln conditioning for other reasons. Anecdotal data indicated that several treaters have successfully used steam conditioning prior to CCA treating.

Furthermore, the historical practice of steam conditioning and then treating in the same cylinder lead many to believe that steam conditioning was not practical. This was because of the residual heat from steam conditioning would cause the CCA to "fix" prior to adequate treatment. Also, the commingling of wood sugars and derivatives would cause the CCA preservative to form a precipitate or sludge. Since TEC will be conducting steam conditioning in separate cylinders from the CCA treatment cylinder, such problems will not evolve. When presented with this scenario, several of the polled experts concurred that steam conditioning was allowable and that no technical barriers exist for the steam conditioning of poles prior to CCA treatment.

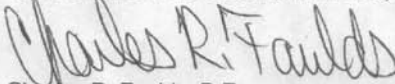
We are currently pursuing this project on a test basis, and we have found that we are attaining 100% penetration. We are working with outside treaters to attain the 0.60 lbs/cuft retention requirement.

Accordingly, pursuant to AWPA Technical Committee Regulation 14.2, TEC respectfully requests a written response within 30 days regarding the acceptability of steam conditioning poles prior to CCA treatment.

Your attention to this matter is greatly appreciated.

Sincerely,

TEXAS ELECTRIC COOPERATIVES, INC



Charles R. Faulds, P.E.  
Senior Vice President  
Treating Division