

# NEW ZEALAND TIMBER PRESERVATION COUNCIL

Incorporated

nark PO Box 308, Wellington, Ph: +64-4 473 5200 Fax: +64+4 473 6536

M B E R Email: inquiries@nztpc.co.nz Website: www.nztpc.co.nz



#### **CIRCULATE TO:**

G.M. Site Mgr Plant Mgr Plant Op Sales Mgr

## Cylinder Certification - Exemption

Yes folks, we finally have a result on this one ...

Thanks to the persistence of Stefan Jasinski with the help of the likes of John Hadwin, John Lord, Terry Smith, Craig Martin and David Gibson we been able to achieve an exemption from the requirements of the PECPR Regulations for cylinders installed prior to March 2004 subject to a number of conditions.

#### These conditions are:

- It applies to approved water borne preservatives only (CCA, ACQ, CUAz, Boron).
- It applies to cylinders up to 95,000L volume.
- It applies to cylinders with a design pressure not exceeding 1700 kPa.
- Cylinders must operate at ambient temperature.
- Cylinders should have no steam or air pad when operating under pressure (i.e. full of fluid under pressure).

The cylinders will still require a "fit for purpose" inspection which could take place at the same time as the HSNO inspection and as a result a report will need to be filed at the treatment plant site available for examination by the test certifier or Department of Labour.

The exemption does not apply to cylinders where steam fixation is used nor to LOSP cylinders.

TPC is however continuing to work with Department of Labour and will seek to achieve exemptions for steam fixation and LOSP cylinders. We felt it best to get exemptions for the water borne out of the way first then deal with the more contentious issues surrounding these other cylinders.

By our estimate this exemption will save the timber treatment industry around \$5.0 million.

Normally all treatment cylinders and their associated systems (valves, pipes, etc) are required to comply with the Pressure Equipment, Cranes and Passenger Ropeways (PECPR) Regulations and to be issued with a Certificate of Inspection. The PECPR Regulations rely to a large extent on ensuring that cylinders conform to their design specifications.

In the majority of cases with treatment cylinders there are no design specifications or drawings in existence. This would mean that in order to comply, cylinders would need to undergo extensive inspection to ensure conformance. The estimated cost of this is anywhere from \$15,000 to \$50,000 per cylinder, depending on age, construction type, condition, etc.

TPC did a lot of work with the Department of Labour in the last three months to seek a practical solution to this matter. This has involved considerable discussion about toxicity of various preservatives and cylinder operating procedures. The cylinder exemption is the successful outcome of all this work. Remember though that cylinders installed after March 2004 will need a Certificate of Inspection under the PECPR Regulations. We don't expect this to be a big issue though because those cylinders will have all the design data available to enable them to be certified without any problem.

### **HSNO Test Certification of Tanks**

Under the HSNO all container systems, including storage and working tanks and treatment cylinders for the timber preservation industry, must be certified by a test certifier.

The time frame for this is:

#### 31 March 2006

By this date arrangements must be in place to have your tanks assessed.

#### 31 March 2007

By this date tanks will need to have been assessed and arrangements must be in place to have any remedial work done to ensure that compliance with HSNO is achieved.

We will be sending to all licensees a summary of all the requirements that need to be satisfied to ensure compliance with the HSNO.

TPC will be appointing an engineer, or firm of engineers, to conduct an assessment of all licensee's tanks. This will ensure that as an industry we can negotiate the best rate and also achieve a level of consistency across the country. To make things easy for licensees TPC will be drawing up a standard letter of engagement of an ERMA Approved Test Certifier and in turn they will contact an engineer to conduct the assessment. All licensees will need to do is sign the letter. Similarly, TPC will be drawing up a standard check list for the engineer to follow in conducting the assessment.

Overall, it is our intention to make it as simple as possible for licensees to achieve compliance for their tanks.

Remember .... Sit tight on this one, we will have something more specific sent out to you shortly. There is no need for you to do anything at this stage; we will be in touch in the New Year.

### CCA in Australia

The outcomes of the APVMA review will come into effect on 31 March 2006. From this date the following requirements will apply:

- All CCA treated timber will, in addition to the present information covering plant number, preservative number and hazard class, need to be branded with the words "treated with copper, chrome, arsenate" – see example below.
- CCA treated timber will not be permitted for use in children's playgrounds, domestic patios, decks and handrails.

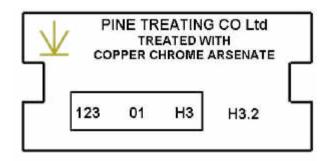
With regard to the latter requirement there is currently no linkage between the APVMA outcome and the Australian Building Code.

There is therefore some uncertainty about the ability of the building authorities to effect the restrictions. However, it appears that the merchant trade will be looking to restrict their stock holdings of CCA treated timber to products that will comply with APVMA.

In the meantime a wipe test study is about to be commenced. The study will involve a series of comparative hand wipe tests on decks less than six months old and decks over two years old.

The survey is expected to be completed by mid 2006.

APVMA have been involved in establishing the protocols for the survey. If the test results indicate that there is little or no exposure to arsenic from the tests then presumably the restrictions will be lifted. We will wait and see.



#### Preservative numbers

Numbers assigned to azoles are:

- Propiconazole + tebuconazole + permethrin = 64
- Propiconazole + tebuconazole = 65

Please note this is different from the existing where propiconazole + tebuconazole is 64.

### Australian standard

TPC was represented at the last Standards Australia TM6 meeting where the following main decisions were made:

- It is proposed that the Australian standard for treating solid wood, AS 1604.1 and the joint Australian/New Zealand standards for treating reconstituted wood, plywood, LVL and glued laminated timber, AS/NZS 1604 Parts 2 to 5 will be amended to permit the use of LOSP azole for H3. A draft for public comment will be released shortly and subject to acceptance the amendment should come into effect by May 2006.
- At the same time it is proposed that Boron, by vacuum pressure impregnation be accepted for H2 (retention 0.35%) when used south of the Tropic of Capricorn. This proposed amendment will follow the same public comment procedures as LOSP azole.
- The penetration pattern for LOSP treated glued laminated beams was hotly debated. In spite of arguments put up to require full sapwood penetration and

statements that this is routinely achievable in New Zealand, it has been agreed following doubts about the need and practicality of full sapwood penetration, to propose a requirement for 80% penetration across the whole cross section. As with LOSP azole and Boron H2 above, this proposal will be put up for public comment. In the meantime trials are underway to see whether this penetration pattern can be consistently achieved.

Other matters discussed were:

- Tin at 0.16% this is no longer a health issue given the approvals for LOSP azole by Forests NSW and Queensland DPI.
- Acceptance of a laboratory analysis method for LOSP azole – note, there is no spot test for LOSP azole.
- Various issues relating to a revision of AS/NZS 2843, the timber preservation plant safety code.

### ISPM 15

ISPM 15 are the international rules for the sterilisation of packaging timbers such as those used in pallets, bins and trays and as gluts and bearers for timber packets. The purpose of the rules is to ensure that this timber is free of fungal and insect infestations when it crosses international boundaries.

Under the rules there are two methods for sterilising packaging timber – heat and fumigation. Preservative treatment is not acceptable but may be acceptable on a one-off basis.

The Australian biosecurity agency, AQIS, is planning to introduce the ISPM 15 rules on 1 January 2006 for break bulk cargo. For the first three or four months however they intend to permit a period of non-enforcement and will only seize items for treatment in Australia, at importers' expense, if the wood is found to have infestations. Importers will be advised of non-compliance with documentation or branding requirements but will not be penalised during this period.

After the non-enforcement period AQIS will implement the rules and where there is non-compliance with documentation or branding and where infestations are found, cargo will be detained.

If you are supplying timber packaging to exporters of goods to Australia you should seek registration as an ISPM 15 accredited suppliers from AgriQuality.

We are currently seeking recognition of the WOODmark® by AQIS as an acceptable form of verification of sterilisation but there are a number of issues to be dealt with and progress will be slow.

We will keep you informed of developments

#### **Best Practice Guideline**

This has now been completed (at last!! I hear you say) with the final matter relating to treatment cylinder certification being resolved.

Electronic copies will be available on the world wide web at:

www.nztpc.co.nz; www.ermanz.govt.nz; www.dol.govt.nz

Hard copies are being printed and will be available in the New Year. We shall be supplying a complimentary copy to all WOODmark® licensees.

It is the intention of the TPC to supply to all licensees a compliance summary checklist of the new BPG. Our auditors will be assessing your site mid-way through 2007.

#### TPC Technical Committee

The Technical Committee met recently to discuss a number of issues including:

- End sealing "required" for outdoor, "recommended" for protection uses.
- LOSP azole and H3.2 inhibited by 50 year durability requirement.
- Treatment of Baltic Pine TPC will keep an eye on this, some species under this generic heading treat better than others.
- Sampling and analytical methods and pass rate requirements – no new preservatives will be approved unless there is an economical/practical method of test.
- Copper napthenate application by Koppers Arch for approval in H3.1 for fascia and cladding at 0.05% retention.
- Surface coatings for H3.1 claddings paint systems do not add to the durability of the timber, in fact poorly maintained systems may be conducive to decay.

# LOSP Treaters Group

This group continues to be active with its latest meeting held on 7 December. Discussion in the meeting covered a wide range of topics of interest to the LOSP treatment industry including:

- Improved solvent flash off when treating with azole and how this may impact on BPG requirements.
- Paper trails to keep customers informed of treatment dates, method of storage, etc.
- Operating conditions that will assist with achieving PECPR exemption for LOSP cylinders.
- Justification for differentiating between paints and stains by territorial authorities.

# NSW - Waste Disposal

The NSW government has identified 16 wastes of concern in its "Extended Producer Responsibility (EPR) Priority Statement 2004. One of the 16 is "treated timber.

Although treated timber is not in the top 10, it has attracted attention to the extent that timber organisations in Australia have been asked to report on specific proposals or current actions by industry on this subject by 31 March 2006 with a view to implementing a process by October 2006.

Such a process would cover:

 Development of processes to identify and separate treated timber from mixed timber wastes.

- Programmes to educate consumers about proper disposal of treated timber.
- Assessment of options to use more benign alternatives to treat and preserve timber.
- Action to develop end-market uses for recovered treated timber.

This development will not directly affect licensees but over the longer term demand for treated timber could be impacted. You should keep in touch with your Australian agent re developments.

TPC will keep abreast of developments and make appropriate submissions where necessary.



It's been a very hectic year for TPC and we know that licensees and chemical companies alike have also had a very challenging twelve months.

We hope that these challenges have been largely overcome and that the industry can look forward to a relatively trouble free 2006.

We take this opportunity to wish all licensees and suppliers the very best for the festive season.

Kevin Hing



Treatment standards have been pleasing overall in 2005 with an overall pass rate of 88% for all treated timber that was analysed.

This is a good result as 10% or so would have been marginal failures with only a couple of percent having a major failure.

It has been good to see great progress being made with treaters own internal testing of treated timber, with the majority of plants now adhering to Appendix 2 of The TPQM.

Every year seems to get busier and 2005 has certainly been no exception.

Activities and promotions this year have included:

- Nationwide roadshow from Whangarei to Invercargill.
- BOINZ conference trade stand.
- FTMA conference trade stand.
- Complete update of website, www.nztpc.co.nz
- Distribution of 20,000 new information brochures.
- Approved handler courses x 8.
- Formation of a LOSP treaters group.
- TPC conference Preserving the Future.
- Publication of the new "Best Practice Guideline" for timber preservatives.
- Review of the Timber Preservation Quality Manual.
- Technical committee meetings.
- Representation on all relevant Standards committees New Zealand and Australia.
- HSNO Compliance Information and Services; i.e. tanks, handlers and locations.

LOSP treaters should prepare to provide IPBC samples from the first quarter of 2006 and a method is being commissioned at present for azole treatments with this test being available from the second quarter.

Anyway, to be consistent here's your joke for this Issue.

A little withered old man walks into a timber company office and applies for a job as a lumberjack. The foreman politely tries to talk him out of the idea. After all, he is old, small and apparently much too weak to fell trees. The old man picks up an axe and walks over to a huge Radiata. As he goes to work, a high pitched whine comes from the axe, chips of wood fly everywhere and the odour of burning wood fills the air. In record time, the old man is finished chopping down the tree. "That's just astounding" the foreman says "wherever did you learn to chop down trees like that?"

"Well know" the old man smiles "have you ever heard of the Sahara Forest?"

That's about it for this year.

On behalf of Barry and myself, Merry Christmas and a Happy New Year.

Stefan Jasinski

<sup>&</sup>quot;You mean the Sahara Desert"

<sup>&</sup>quot;Sure, that's what it's called NOW..."