

## Comments to the NASFM Commodity bulletin

The proposed Code Application Bulletin: *Pallet Fire Loading Impact on Sprinkler Design*, is a well intentioned attempt to establish a better understanding of NFPA 13 requirements, thereby facilitating more uniform enforcement. Upon careful review of the proposed interpretative bulletin, AF&PA is opposes its issuance for the following issues:

1. Complete lack of data establishing a problem to be solved
2. Misinterpretation of NFPA 13 requirements or the intent of the committee
3. Lack of discriminating physical parameters to establish differences in structural materials which might be subject to this bulletin.

### Lack of Data

The difference in engineering wood fiber to perform better by binding it with resin compared to engineering resin to perform better by reinforcing it with fiber is enormous. So-called engineered wood products, or EWP's, include wood structural panels (plywood and oriented strand board), structural composite lumber, oriented strand lumber, and laminated veneer lumber. These products have been tested for ignition temperature, rate of heat release and flame spread to name a few characteristics. This testing has shown that they are not significantly different from solid sawn lumber in these regards.

### Misinterpretation of NFPA 113

The bulletin has virtually no data to suggest that any pallets constructed of wood-based structural material have presented a special fire hazard requiring a "different interpretation" on the NFPA 13 text. No case studies are offered as a reason to pursue this bulletin. There is a dearth of information to suggest that it is necessary to examine this subject. Lacking any substantiation, this effort to raise the hazard classification of pallets with minute amounts of resin should be withdrawn.

### Lack of Established Performance Characteristics

What level of heat release, flame spread, ignition temperature, pooling of melted material and other characteristics is acceptable? This point is clearly missed by the failure to acknowledge the difference between wood materials bound with resins to enhance the wood's mechanical properties and plastic resins reinforced with fibers (that may include wood fibers) to enhance the resin's mechanical properties. This is a huge difference and it is fundamental to understand the difference in order to properly effect adequate fire protection for items, including Pallets, constructed of these materials.

The potential for fire growth of wood is assessed by its surface flame spread characteristic. For materials that do not melt or drip when heated, a flame spread rating of Class C or better would be equivalent to that of solid-sawn wood.

A far more meaningful pursuit would be to establish an adequate description of resin being reinforced with fiber and wood fiber being bound by resin. To establish this distinction is to answer the question that seems to underlie this inquiry: *How much plastic is too much plastic?* The product engineering will answer it for you.

Sincerely,

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