



6300 Enterprise Lane

Madison, Wisconsin 53719

608.271.1176

608.271.7006 fax

www.qualtim.com

September 24, 2013

Mr. Ted Berman
Product Approval System Administrator
Ted Berman and Associates LLC
925 41st Street, Suite 104
Miami Beach, FL 33140

RE: FL16404- PRODUITS FORESTIERS LAMCO INC

Dear Mr. Berman:

This letter is in response to the public comment received from Jaime Gascon with regard to the use of Lamco LFL[®] in the HVHZ. While it is true that the documentation submitted does not explicitly reference use in the HVHZ, we believe there are no provisions in the HVHZ sections of the *Florida Building Code (FBC)* that preclude its use in this area.

The product is made from Black Spruce #1&2 or MSR lumber. Short segments of the lumber are assembled with tongue and groove joints along the length of the members and finger joints across the width of the members. All joints are adhered with a heat-resistant adhesive of phenol-resorcinol-formaldehyde (PRF), the same adhesive used in many glued-laminated beams. The wood lumber properties and species, adhesive, manufacturing parameters, and finished product dimensions and tolerances are specified in the approved quality documentation and Lamco's in-plant manufacturing standard. Quality control is monitored in accordance with these standards and is verified through the use of a third-party quality control agency. Material design properties of the various grades are shown in the Technical Evaluation Report (TER) submitted and are used to resist the imposed loads whether in the HVHZ or elsewhere.

As shown on the next page, *FBC* Section 2303.1.9 references the use of *ASTM D5456*, without exceptions. This is the standard that was used to establish the structural properties of the Lamco LFL[®] product line.

SBCRI is an Approved Agency

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Qualtim is an Approved Source

The *IBC* defines:

- **APPROVED AGENCY** – “An established and recognized agency regularly engaged in conducting tests or furnishing inspection services, when such agency has been *approved*.”
- **APPROVED SOURCE** – “An independent person, firm or corporation, *approved* by the *building official*, who is competent and experienced in the application of engineering principles to materials, methods or systems analyses.”

Qualtim's building construction professionals meet the competency requirements as defined in the *IBC* and can seal their work. SBCRI is an ANSI/ACCLASS certified agency and SBCRI & Qualtim are regularly engaged in conducting and providing engineering evaluations of single element and full scale building systems tests (see examples at www.sbcric.org/ibcirc.php and www.qualtim.com/rapiddevelopment). This TER is developed from test reports complying with *IBC* Section 104.11.1 Research reports, which states, “Supporting data, where necessary to assist in the approval of materials or assemblies not specifically provided for in this code, shall consist of valid research reports from *approved* sources.”

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protected below ground level with a bituminous coating.

2303.1.6 Hardboard. Hardboard siding used structurally shall be identified by an *approved agency* conforming to CPA/ANSI A135.6. Hardboard underlayment shall meet the strength requirements of $\frac{7}{32}$ -inch (5.6 mm) or $\frac{1}{4}$ -inch (6.4 mm) service class hardboard planed or sanded on one side to a uniform thickness of not less than 0.200 inch (5.1 mm). Prefinished hardboard paneling shall meet the requirements of CPA/ANSI A135.5. Other basic hardboard products shall meet the requirements of CPA/ANSI A135.4. Hardboard products shall be installed in accordance with manufacturer's recommendations.

2303.1.7 Particleboard. Particleboard shall conform to ANSI A208.1. Particleboard shall be identified by the grade *mark* or certificate of inspection issued by an *approved agency*. Particleboard shall not be utilized for applications other than indicated in this section unless the particleboard complies with the provisions of Section 2306.5.

2303.1.7.1 Floor underlayment. Particleboard floor underlayment shall conform to Type PBU of ANSI A208.1. Type PBU underlayment shall not be less than

Fig. 2303.1.9.1

2303.1.9 Structural composite lumber. Structural capacities for structural composite lumber shall be established and monitored in accordance with ASTM D 5456.

2303.1.10 Structural log members. Stress grading of structural log members of nonrectangular shape, as typically used in log buildings, shall be in accordance with ASTM D 3957. Such structural log members shall be identified by the grade *mark* of an *approved* lumber grading or inspection agency. In lieu of a grade *mark* on the material, a certificate of inspection as to species and grade issued by a lumber grading or inspection agency meeting the requirements of this section shall be permitted.

2303.1.11 Round timber poles and piles. Round timber poles and piles shall comply with ASTM D 3200 and ASTM D 25, respectively.

2303.2 Fire-retardant-treated wood. *Fire-retardant-treated wood* is any wood product which, when impregnated with chemicals by a pressure process or other means during manufacture, shall have, when tested in accordance with ASTM E 84 or UL 723, a *listed* flame spread index of 25 or less and show no evidence of significant progressive combustion when the test is

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23.3

Building design using this product is done in accordance with the standards listed in *FBC* Section 2314.4, namely *ANSI/AF&PA National Design Standard for Wood Construction, 2005* and *ANSI/AF&PA SDPWS-2008 Special Design Provisions for Wind and Seismic*.

For these reasons, we believe that Lamco LFL[®] should be approved for use in the HVHZ as submitted.

Respectfully Yours,



Kirk Grundahl, P.E.
President