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September 22, 2023

VIA FEDEX and EMAIL

Nathalie Rioux
Standards Coordination Office
National Institute of Standards and Technology
100 Bureau Drive, Stop 2100
Gaithersburg, MD 20899-2100
Email: nrioux@nist.gov

Re: Proposed Voluntary Product Standard PS 1-22

Dear Ms. Rioux:

We represent the U.S. Structural Plywood Integrity Coalition ("Coalition"), which includes the following eight companies: Scotch Plywood Co., Inc., Veneer Products Acquisitions, LLC, Southern Veneer Specialty Products, LLC, Hunt Forest Products, LLC, Freres Lumber Co., Inc., Murphy Company, SDS Lumber LLC and Swanson Group, Inc. These eight family-owned companies operate nine plywood plants in Oregon and Washington and four in Alabama, Georgia and Louisiana. Combined, these companies employ more than 4,000 workers.

The Coalition filed a petition in December 2020 that initiated the process under which the PS 1 Standing Committee appointed a Standard Review Committee to conduct a review of the PS 1 Standard and develop its proposed Voluntary Product Standard PS 1-22, Structural Plywood, published in the Federal Register on August 24, 2023. As noted in that petition, several highly inappropriate practices by PS 1 certification, inspection and testing agencies licensing PS 1 structural plywood manufacturers in Brazil created an urgent need for the PS 1 Standing Committee "to address a major failure by two certification, inspection and testing agencies to perform their quality control functions as authorized licensors of PS 1 grade stamps to plywood manufacturers in southern Brazil."

As explained below, following a thorough review of the proposed changes to the PS 1 Standard, the Coalition supports the proposed changes and congratulates the Standard Review Committee and the PS 1 Standing Committee on the comprehensive character of its work, particularly the substantial rewriting of Section 7 governing "Marking and Certification" and the new Section 8 entitled "Quality Assurance Requirements."

As proposed, the much more detailed Section 7 makes clear that a certification agency accredited to certify plywood manufacturers under the PS 1 Standard must perform the necessary testing, inspections, and data analysis to be confident that its licensees can and do produce on-grade PS 1 structural plywood using veneer resources that will consistently meet the standard. Section 7, in combination with other clarifying changes in Sections 5 and 6, now makes clear that PS 1 certification, testing and inspection agencies are prohibited from engaging in any form of biased qualification testing, granting interim certification approvals and stamping privileges without testing, utilizing biased subcontractors as inspectors or failing to regularly perform periodic inspections and testing. These are all important clarifications of the existing PS 1-19 Standard that bring the precise language of the standard into line with its longstanding spirit and goals.

The Coalition also wishes to express its strong support for the proposed new Section 8, which requires that each PS 1 manufacturer's quality assurance program must be documented in an approved Quality Manual and be subject to minimum requirements for ongoing inspection and testing by each manufacturer's certification, inspection and testing agency. It is worth noting that the quality assurance requirements set out in the proposed Section 8 are clearly modeled after the gold standard practices of the APA-The Engineered Wood Association. Importantly, these include a Quality Manual for each certified PS 1 mill, an assessment at least annually that the mill specifications for each mill are appropriate for the products being certified, consistent programs of inspection and testing based upon unbiased random sampling that is "representative of the population being inspected or tested," and rigorous corrective action procedures. Clearly, this new quality assurance section requires a certification, inspection and testing agency to perform annual testing like the APA's annual bending stiffness tests to assess the licensed mill's ongoing capability to meet the PS 1 Standard as well as the regular inspections and testing throughout each year that are the foundation of the first-rate quality control program that the consuming public expects are a fundamental component of any product with important life and safety functions.

In conclusion, the U.S. Structural Plywood Integrity Coalition strongly supports adoption of the proposed PS 1-22 Standard. While the Standard Review Committee elected not to add control of the accreditation process to the PS 1 Standard in a manner comparable to the American Lumber Standard Committee that controls accreditation of certification, inspection and testing agencies under the PS 20 product standard governing structural lumber, the Coalition is hopeful that the substantial proposed revisions to the PS 1 Standard and the lessons learned from the two federal court cases prosecuted by the Coalition will result in more comprehensive and appropriate accreditation procedures by existing accreditors in the U.S. such as International Accreditation Service, Inc. and the American Association for Laboratory Certification, Inc.

Very truly yours,



Michael E. Haglund



September 22, 2023

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cc:

Scotch Plywood Co., Inc.

Veneer Products Acquisitions, LLC

Southern Veneer Specialty Products, LLC

Hunt Forest Products, LLC

Freres Lumber Co., Inc.

Murphy Company

SDS Lumber LLC

Swanson Group, Inc.

