

# OVERVIEW OF GRADING AGENCIES' ENFORCEMENT OF THE AMERICAN SOFTWOOD LUMBER STANDARD

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Good morning ladies and gentlemen. I appreciate the opportunity to join you for the 50<sup>th</sup> annual meeting of the Western Dry Kiln Association. As a grading agency representative, my technical knowledge of kiln drying is somewhat limited to operating a hand-held moisture meter. Realizing that you folks already know how to operate a moisture meter, I would like to present other information hopefully of interest to you.

I believe in the course of our working careers we tend to become focused on our individual job responsibilities and the structure of our employer's company; however, there are bigger pictures, one of which I will discuss. I am referring to the standards for our softwood manufacturing industry. I do understand that some attendees are involved in hardwoods. How the hardwood industry is structured is somewhat of a mystery to me; therefore, that subject will not be included.

As is usually always the case, somewhere in the pecking order is good old Uncle Sam. At the top of our softwood lumber manufacturing industry, in this case, we have the Department of Commerce. The Department of Commerce publishes the Voluntary Product Standard for Softwood Lumber. These standards date back to at least 1924; however, the first one with any real teeth was introduced in 1970 and was known as the PS 20-70. That particular standard has established our National Grading Rule, which we will discuss in a few minutes. Today's standard is the PS 20-94. The 1970 standard remained in place until it was revised in 1994, and as we sit here the PS 20-94 is being revised again for the next printing. The product standard is reviewed and/or revised every five years. The PS 20-94 sets parameters for a number of issues that needed to be addressed for lumber manufacturing.

Probably first and foremost are the size standards. The product standard sets up all the sizes for thicknesses and widths for green lumber and dry lumber. Additionally, it sets up the moisture content standards. The limitation of 19% moisture content (15% for some products) as being considered dry is set forth in PS 20-94. Anything exceeding 19% moisture content would be classified as unseasoned lumber. Additionally, the product standard set up the different classifications of lumber. The classifications are yard lumber, structural lumber, and factory lumber. Also, the standard sets up the rules for measurement and tally. The standard sets up the grading rule requirements including the grade stamp requirements and the design value requirements for all of our structural lumber. It also sets up the rules that agencies must comply with as far as inspection and reinspection.

A big part of the standard is the portion that sets up the American Lumber Standard Committee, Inc. The American Lumber Standard Committee includes two available seats for some of the larger grading agencies such as Southern Pine Inspection Bureau, Western Wood Products Association, and West Coast Lumber Inspection Bureau. Other qualified agencies are allowed one seat. Architects, engineers, distributors and retailers are allowed two seats on the Committee, and the

intermediate manufacturers in wood using industries - contractors, home builders are allowed one seat on the Committee. Additional seats are available as non-voting seats and are filled by government agencies such as the Department of Defense, Department of Agriculture, Department of Interior, etc.

PS 20-94 sets up the provisions for a subcommittee of the ALSC known as the National Grading Rule Committee. The National Grading Rule defines all the classifications and allowable characteristics for dimension lumber up to 4" thick intended to be used for structural purposes. These rules are uniform throughout North America. It does not matter what rule book you pick up, these rules will be identical in each rule book. The only difference is the applicable design values which are determined by the species of the product. For example the grade rules characteristics, allowable knot sizes, etc. in a piece of No. 1 2x6" Douglas-fir from the Oregon Coast are identical to a piece of spruce coming out of eastern Canada. The only difference is one species has different strengths versus another species; therefore, different design values apply. Taking into consideration the National Grading Rule Committee sets up the NGR rules, it is obvious that knowledgeable lumber people must be well represented on the NGR Committee.

One of the primary functions of the American Lumber Standard Committee is to audit the grading agencies in the United States and Canada and insure they conform to the ALSC Enforcement Regulations. Additionally, the ALSC Committee approves grade rules and approves agencies. In North America there are seven different grading rules that have been approved by the American Lumber Standard Committee.

North of the border in Canada, one set of grade rules is used for all of Canada. That rule book is the NLGA or the National Lumber Grading Authority. Operating in Canada are 16 different grading agencies; however, they all use the same set of rules. Much of this Canadian rule book also incorporates a number of WWPA rules simply because that is what is acceptable in the marketplace.

In the United States, we have six separate sets of grade rules. In the Great Lakes area we have the Northern Softwood Lumber Bureau rules. Here, again, most of their book is a duplication of the WWPA rules. In the New England area, the rules-writing agency is NeLMA (Northeast Lumber Manufacturer's Association) and their rule book is the NeLMA rule book. Again, they incorporate a number of WWPA rules into their rule book. Operating basically from Maryland south, along the East Coast and across the Southern states, the rules-writing authority is the Southern Pine Inspection Bureau. There are two additional agencies that operate in this same geographic area; Timber Products Inspection (TPI) and Renewal Resources Associates (RRA).

In the Western states, which includes the 12-Western states and Alaska, we have a number of agencies that operate. Three different sets of rules are used in the West. In the California Redwood area, the Redwood Inspection Service (RIS) is the rules-writing authority for redwood. Additionally, in the West we have two other rule books; the West Coast Lumber Inspection Bureau (WCLIB) Standard No. 17, and the Western Wood Products Association (WWPA) Western Lumber Grading Rules '98. Therefore, in the West we have three separate sets of grade rules written by three different agencies. There are also three additional agencies which operate in the West which are not allowed to write rules. These three agencies would be Pacific Lumber Inspection Bureau (PLIB) located in the Seattle, Washington area; Timber Products Inspection (TPI) with an office in Portland, Oregon; and California Lumber Inspection Service (CLIS), San Jose, California. Here again the three rules-writing agencies would be the Redwood Inspection Service (RIS), Novato, California; West Coast Lumber

Inspection Bureau (WCLIB), Portland, Oregon; and Western Wood Products Association (WWPA), Portland, Oregon. As each of these six agencies in the West are qualified under all three sets of rules, a mill can produce lumber and grade to any of these standards. The mill's agency is qualified to oversee that manufacturer's product from whichever rule book it has been graded.

One additional rule book exists that is quite often used in the West. The Export R-List Rules are published by Pacific Lumber Inspection Bureau; however, the R-List has not been approved by ALSC even though it is one of the oldest or maybe the oldest rule book in existence.

These six agencies basically cover the 12-Western states; however, there are a few exceptions. For example, Timber Products Inspection operates in the South, in addition to their operation in the West. Pacific Lumber Inspection Bureau also operates as an agency in British Columbia. PLIB is the only agency that operates in both countries. West Coast Lumber Inspection Bureau has a few mills in the South and additionally have a number of mills in the Scandinavian countries that they service on a monthly basis. WWPA also has an office in Anchorage, Alaska, for inspection of the mills that operate in Alaska.

Not all agencies perform the same services. The chart I have shown here is close as best I could at this particular time; however, you should understand it could be in error simply because of volumes and number of mills. These change rapidly from month to month. Services rendered by associations may also vary according to their needs at any particular time.

Total volume in the West is approximately 16.4 billion board feet. WWPA volumes supervised are more than double the next largest agency. I have noted those agencies that provide grading rules. Here again, WWPA, WCLIB and RIS.

All rules-writing agencies are obligated to have technical support to back up their rule book. Product support is provided by some agencies. Our agency has representatives in the field whose purpose is to work with building code officials, architects, engineers, consumers, etc., and provide any information needed by those groups.

WWPA provides grader training assistance. During monthly mill inspections, WWPA lumber inspectors are available to spend time on the grading chain to offer advice and lumber grade education. Upon request, we conduct informal training sessions for a group of graders at a mill. Group grade meetings have always been an important part of our training exercises. While basic lumber training is done by mills, our group grade meetings provide additional grading instruction through friendly competition. The meetings are held each spring and summer and they offer hands-on lumber grading education.

WWPA provides finger joint quality control procedures and finger joint services and machine stress-rated (MSR) procedures and MSR services. We can assess mill lumber production to determine potential MSR yields. Recommendations and advice on fingerjointed lumber process, including equipment and testing areas, are also available. We provide oversite for both dry and green fingerjointed lumber production for 13 lumber manufacturers. Our quality control certification and monthly inspection for mills producing MSR lumber is utilized by seven manufacturers.

WWPA is heavily involved in export lumber grading. All NGR gradestamped lumber recognized in North America is acceptable in Japan; however, our Japanese Agricultural Standard (JAS) Certification program, utilized by six mills in the West, certifies those plants to Japanese Standards and they are allowed to gradestamp their lumber under Japanese rules with a Japanese grade stamp, which, in turn, brings a premium price for their product. We are also involved in the Australian standards and the British standards, as needed. Several agencies have international recognition through the Softwood Export Council. This group, funded by a number of agencies, universities and states, has representatives in Japan, Korea, Mexico and Europe.

WWPA's Hi-Q Program is used to identify graders performing at the top level of accuracy for their companies. We provide everything a mill needs from performance reports to award materials to recognize these individuals grading performance.

Each year WWPA acknowledges individuals who have made a significant contribution to manufacturing and quality control in the western lumber industry. The Master Lumbermen are individuals nominated by their company and recognized by the industry at the Association's annual meeting. Currently there are 288 recipients of this award which dates back to 1968.

Our mill efficiency studies are conducted by our Regional Quality Control Directors. This review evaluates all facets of a mill's lumber production process from the log deck to the shipping area. The study can yield recommendations for mill improvements that can increase grade recovery and streamline operations.

All agencies offer a host of lumber certificates to insure customers of product quality or to meet export market requirements. Inspection certificates provided through WWPA affirm the grade accuracy and the quality of the product sold. Kiln drying, heat treatment and debark grub hole control certificates issued by WWPA in cooperation with the U. S. Animal Plant Health Inspection Service (APHIS) are available for export shipments.

WWPA also has full member services available. Primarily this program covers product support and business information. We have the most comprehensive data base of western lumber price information available for all products including the destination of those products. This allows full members to analyze their mill sales performance against industry averages.

In summary, we have in North America a system of voluntary standards and rules which have worked well for a number of years. The end result of these standards and rules is that softwood manufacturers can provide their customer with a product on which they can depend.