

Re: NAFA Response to the ICI Corrosion Advisory

While NAFA is grateful that RCI has considered our concerns and recommendations on this matter, there are some key points that readers of the advisory should know:

- Only a handful of corrosion issues have been reported where a bagasse (cane) fiberboard product was incorporated into a low slope roofing system placed over a steel deck that has developed an accelerated rate of corrosion. All were reported in the same, Gulf States geographical area.
- The cause of these handful of (premature steel deck corrosion) cases is still undetermined
- Zero reports of problems with wood fiberboard have come to light.
- It was reported that a RCI-TAC survey noted "most applications in which corrosion was observed for metal components in direct contact with fiberboard roof insulation of any type, the corrosion was associated with roofs that were aged, leaking, and lacking maintenance." Consequently, corrosion may occur under such conditions no matter what cover board was in contact with the steel deck.
- It was reported that bagasse fibers were treated with liquid chlorine during open field storage prior to being used in the manufacturing process. To our knowledge, there is no evidence to support this contention. It is our informed opinion that liquid chlorine was not applied to bagasse fiber during storage or at any other step of the manufacturing process.

Furthermore, it is reported in the Technical Advisory that "the majority of the industry currently believes that the corrosion problem <u>may be</u> related to the incorporation of bagasse fibers into fiberboard roof insulation." The members of NAFA do not concur with that assessment. Based on the facts mentioned above, we find it highly unlikely that the bagasse fiberboard will ultimately be determined to be the cause of the corrosion.

The advisory is specific to bagasse fiberboard. However, the advisory "Recommendation" references "fiberboard", instead of bagasse fiberboard.

• These references are misleading and injurious to the wood fiberboard industry.

- The fiber source of NAFA members is wood fiber, which is distinctly different from bagasse fiber identified in the advisory.
- Bagasse fiberboard has not been manufactured in North America since 2006. That manufacturer is no longer in business and the manufacturing facility has since been scrapped.
- No member of NAFA has ever manufactured bagasse fiberboard.

The members of NAFA appreciate the reason for the issuance of a Technical Advisory cautioning individuals about a potential safety concern when performing an evaluation of an existing roof exhibiting problems. However, since the cause of these handful of cases is still undetermined, and since we believe that it is highly unlikely that bagasse fiberboard will ultimately be determined to be the cause, it is our opinion that the Technical Advisory Recommendation should not be isolated to roofing systems with fiberboard insulation, but rather it should include all roofing systems over metal decks regardless of whether a bagasse fiberboard insulation was used or not, especially in the Gulf States region. We believe it should read as follows:

- Review metal components for corrosion when performing an evaluation of an existing roof, particularly for buildings localized in the Gulf States region of the United States. There have been a few instances, where a low slope roofing system with a bagasse fiberboard insulation product placed over a steel deck has shown an accelerated rate of corrosion. However, since none of these products have been determined to be the cause of the problem, it may be warranted to conduct a more thorough investigation when a metal deck is involved in that geographical area. Specifically, larger and more test cuts vs. cores, more comprehensive examination of the underside of the metal deck, a review of fasteners used in the system, and other potential points of corrosion are worthy of inclusion.
- It is important to note that evidence of corrosion may not be readily visible or obvious from the underside. A review of conditions prior to accessing the roof is advised to ensure the safety of those persons accessing the roof.

On behalf of NAFA and in fairness to the roofing industry, I request that this NAFA response accompany publication of this advisory.

Respectfully,

Jim Pieczynski President North American Fiberboard Association