

# TIMBER PRODUCTS SERVICES

## STANDARD QUALITY CONTROL PROCEDURES WPM FUMIGATION PROGRAM

The procedures outlined below have been developed to insure that wood packaging material (WPM) is being produced in accordance with the International Plant Protection Convention's (IPPC) Guidelines for Regulating Wood Packaging Material in International Trade. These procedures also conform to the National Wooden Pallet and Container Association's (NWPCA) Enforcement Regulations for Wood Packaging Material.

**NOTE:** These procedures must remain on file and be readily available when asked for by representatives of Timber Products Services or the National Wood Pallet and Container Association.

- I. Audits
  1. The facility is required to facilitate all TPS or NWPCA audits and spotchecks.
  
- II. Facility Records
  1. The facility is required to maintain a systematic method of record keeping for outgoing WPM bearing the internationally accepted IPPC mark.
  
  2. Outgoing shipments of WPM labeled with the IPPC mark must be recorded as a monthly count of individual methyl bromide applications (herein referred to as lots) and treated units. Cut sheets, shipping tickets, or other documentation related to this material should also be maintained for verification purposes.
  
  3. The volume of methyl bromide used must prove to be adequate upon this documentation to justify the volume of treated WPM being produced and labeled.
  
  4. These records are to be kept for at least three years and are to be made available to the TPS representative for review upon each inspection.

### III. Registered Fumigators

1. Qualified methyl bromide applicators or Quality Control Personnel are allowed to apply the IPPC mark to their packaging so long as the applicator and equipment used have been approved by Timber Products Services.
2. Qualified applicators will:
  - A. Have registered with an NWPCA accredited agency
  - B. Have proper active state certification for all relevant sites where applying methyl bromide fumigant
  - C. Adhere to all federal and state laws regarding the application of methyl bromide
  - D. Update TPS (quarterly) on changes to applicator information and/or quality control personnel
  - E. Utilize Export Wood Packaging Material Fumigation Program Report provided by Timber Products Services
  - F. Check and record wood temperature for each lot
  - G. Check and record methyl bromide concentrations for each lot with a fumiscope or other device that measures oz./ 1000 cubic feet
  - H. Fumiscopes and other devices measuring oz./ 1000 cubic feet must be calibrated on a yearly basis
  - I. Contact TPS 48 hours prior to dispatch of fumigator's IPPC stamps to fumigation site
3. The following documentation must be recorded for WPM being produced in this fashion:
  - A. A report for each lot which shows wood temperature, methyl bromide dosage, and methyl bromide concentrations
  - B. The description and quantity of WPM fumigated per lot

### IV. Manufacturing/ Marking

1. WPM which has been fumigated by a TPS approved methyl bromide applicator must be stamped a minimum of two times with the corresponding IPPC mark. IPPC marks should appear on opposite faces.
2. These marks must appear clear and legible on the finished product.
3. All stamping practices must adhere to the TPS Stamping Procedures (see attached).
4. All stamping must be supervised by quality control personnel or TPS approved methyl bromide applicators.

5. Pre-marking of untreated WPM requires a local fumigator to perform or supervise the marking before it is transferred to a secure off-site fumigation facility for treatment. Fumigator must follow the mobile stamping procedure (i.e. 48-hour notification, and return of mark to fumigation office within 24 hours or next business day) and provide transit information (e.g. date, destination, WPM and/or load description, lot number, etc.) of the marked WPM to the inspection agency ASAP.
- V. Quality Control Personnel
1. An adequately trained employee is to be assigned to implement these quality control procedures.
  2. They are vested with the authority to correct any condition which results in the production of a non-conforming product. This includes the following scenarios:
    - A. Training of methyl bromide applicators in the proper process and reporting procedures of Timber Product Services' Fumigation Program
    - B. Removal of the IPPC mark from any product that does not conform to the ISPM 15 standard
    - C. Stopping shipments of non-conforming material
    - D. Holding of non-conforming material and correcting the material held
    - E. Investigation of issues which may lead to the production of a non-conforming product
- VI. General
1. Internal quality monitoring shall be performed to a level that assures compliance to the IPPC standard. WPM found to be in non-conformance shall either be retreated and conformance verified, or the IPPC mark shall be removed from the product.
  2. Lots of material found to be non-conforming by TPS will be held for correction. The material will then be re-verified or have the IPPC mark removed.
  3. Maintaining the quality is the ultimate responsibility of the producer. TPS's function is to audit the procedures and material for conformance. These quality control procedures shall be performed to a degree that assures the continuing compliance of the product to the applicable standards of the program.
  4. Any deviation in operation from these procedures may only be done with the written permission of Timber Products Services.