

Wood Packaging Material (WPM)
Implementation
Guide

For

U.S. Army
CONUS Installations

WPM Self-Certification

Logistics Support Activity
Packaging, Storage, and Containerization Center
March 2008

Army WPM Self-Certification Guide

Applicability. This publication applies to all U.S. Army CONUS located installations that procure, fabricate, or repair wood packaging material (WPM) products such as wooden boxes, crates, pallets, skids, drums, packing blocks, dunnage, etc., that will be used to secure, hold, transship, or transport materiel in International shipments via air, land, or sea modes of transport.

Supplementation. Supplementation of this guide is authorized. Please send a copy to the proponent.

Proponent. The Logistics Support Activity (LOGSA), Packaging, Storage, and Containerization Center (PSCC), as the Army Materiel Command's (AMC) Responsible Office (RO) for packaging, are the guide's proponent. Users may send comments and recommendations to LOGSA PSCC, ATTN: AMXLS-AT (WPM POC), 11 Hap Arnold Boulevard, Tobyhanna, PA 18466-5097.

Distribution. This publication is approved for electronic distribution from http://www.logsa.army.mil/pscc/PSCC_WebDev/PSCC?psccindex.htm

Superseded publications. None

FOR THE COMMANDER:

FRANCIS FLYNN
Chief, LOGSA PSCC

<u>Contents</u>	<u>Page</u>
Purpose -----	2
Scope -----	2
Authority -----	2
Procedures -----	2
Appendix A. Army WPM Self-Certification Audit Checklist --	A-1
Appendix B. Definition/Description of Terms -----	B-1
Appendix C. Glossary of Acronyms -----	C-1

Army WPM Self-Certification Guide

1. Purpose. Phytosanitary requirements (i.e., measures to maintain plant health, including the protection of natural flora and plant products through direct and indirect damage by pests) for wood packaging materials (WPM) have been imposed by the United Nations (UN) guidelines protecting forests worldwide against pest infestation. The Department of Defense (DoD) and its components engaged in packaging of materiel for transnational shipments shall comply with the procedures in International Standards for Phytosanitary Measures Publication No. 15 (ISPM 15) and DoD Manual 4140.01-M-1, Compliance for Defense Packaging: Phytosanitary Requirements for WPM, dated, September 7, 2007. The goal of Phytosanitary processing is to eliminate the migration of pest infestation worldwide via WPM products.

2. Scope. The checklist and procedures in this guide apply to all U.S. Army installation activities that procure and store raw lumber to fabricate, repair, store, and ship WPM products (i.e., wooden boxes, crates, pallets, skids, drums, dunnage, etc.) via any mode of transport to receiving points worldwide. The following checklist and procedures “do not” apply to any wood product made entirely of manufactured wood products such as plywood, oriented strand board (OSB), particleboard, etc.

3. Authority. The U.S. Department of Agriculture (USDA) Animal and Plant Health Inspection Service (APHIS), the U.S. Government Responsible Office (RO) for plant health, has developed and approved a Memorandum of Agreement (MOA) between their organization and the DoD on WPM policy, processes, and procedures. USDA APHIS assisted the DoD in the development and oversight of a DoD-wide program to ensure treatment and marking of WPM that complies with ISPM 15. The program will establish a common basis for uniform, DoD-wide inspection, treatment, and marking procedures for the construction and marking of new WPM, and for the treatment and marking of used, remanufactured, repaired, combined, and recycled WPM in compliance with ISPM 15. All lumber used in the fabrication of certified WPM will be from American Lumber Standards Committee, Inc. (ALSC) WPM accredited lumber mills and will be marked depicting compliance with requirements herein. USDA APHIS allowed the DoD and its components to develop their own WPM self-certification programs. The programs must meet the requirements of the UN ISPM 15. Compliance with the procedures herein meets those requirements for Army activities.

4. Procedures. The use of the checklist and the detailed guidance provided herein will ensure that Army WPM fabrication activities become and remain self-certified WPM program participants. The WPM Site Auditor will use the checklist to verify initial certification and annually, thereafter, to recertify the installation. The WPM Site Auditor will also use this checklist whenever the validity of the process is questioned by receipt of a valid SF-364, Supply Discrepancy Report (SDR). The WPM Site Custodian, WPM Site Auditor, and supervisor of the WPM Site Custodian will sign off on a statement that the installation has completed the steps necessary to bring the installation logistics and shipping activities in compliance with the DoD 4140.01-M-1 on the front cover of their WPM Audit checklist. Forward copy of completed checklist to AMC WPM RO, LOGSA PSCC. If there are any questions on this matter contact LOGSA PSCC, at email: toby.pt@us.army.mil. The DSN is 795-7105 or Comm. 570-895-7105.

Army WPM Self-Certification Guide

1. WPM Site Custodian. Government/contractor employee responsible for maintaining WPM Program documents and records, and for completing monthly, the DoD WPM Internet Website Data is the WPM Site Custodian. The activity commander, logistics director, or highest ranking person representing the activity or facility appoints in writing the WPM Site Custodian. An Army activity (i.e., fort, depot, arsenal) may have more than one WPM Site Custodian (DOL National Maintenance repair facility, Special Operations (self-isolated organization on an installation), deployment activities, etc., but may only have one Site Auditor to inspect and certify that individual wood fabrication or lumber usage activities on an installation are in compliance with Army/DoD WPM Program requirements. WPM Site Custodian will also need a CAC card to enter WPM Internet site for training, documents, and posting monthly lumber usage data.

a. This person's name, mailing address, position title, phone number (DSN & Comm.), and email address shall be forwarded to the U.S. Army Materiel Command, LOGSA PSCC, Army WPM Program Manager, contact LOGSA PSCC, at email: toby.pt@us.army.mil. The DSN is 795-7105 or Comm. 570-895-7105.

Commander
USAMC LOGSA PSCC
ATTN: AMXLS-AT (Army WPM Program Manager)
11 Hap Arnold Boulevard
Tobyhanna, PA 18466-5097

b. The appointed WPM Site Custodian will also be responsible for ordering, controlling access to and return of the marking devices; assigning Government/contract employees authorized to use marking devices (i.e., stamp, stencil, branding iron); and monitoring the print quality of the installation's "HT", "DUN", and/or "Pest Free" marking devices. The Department of Defense Activity Address Code (DoDAAC) that will be used in the WPM marking device(s) is the DoDAAC of the activity that manages the wood box and crate fabricating shop's operation. The custodian will forward the DoDAAC that will be used in the marking devices for locally fabricated or repaired WPM products, i.e., wooden boxes, crates, pallets, skids, etc. to the Army WPM Program Manager, LOGSA PSCC. In addition, as part of the initial audit and for each subsequent annual audit, the WPM Site Custodian must inform the Program Manager, LOGSA PSCC, of the number of HT, PEST FREE, and DUNNAGE (DUN) stamps the installation requires and has on-hand by each type.

c. The WPM Site Custodian will have a secure cabinet to store the WPM marking devices and will have a daily control log, that a person(s) approved by the WPM Site Custodian will sign out (initial), note time and sign again (initial), when turned in and the time. Should the activity's self-certification be pulled due to non-conformance, the WPM Site Auditor will confiscate all marking devices. The devices will only be returned after the activity met the requirements.

d. The WPM Site Custodian should have at least three separate 3-ring notebooks or file folders to hold documents, record data, and other records. One notebook or folder

Army WPM Self-Certification Guide

will hold relevant WPM Program documents and a copy of contract language used for buying local ALSC mill certified HT lumber and other ALSC-certified WPM products (i.e., pallets, boxes, crates, etc.). A second notebook or folder will hold local personnel DoD WPM web site training certificates, supply discrepancy report (SDR) documents and a copy of the most recent installation WPM audit checklist with copies of past audit results. The other 3-ring notebook or folder will hold all the records associated with lumber receipt, storage, use, and WPM product procurement, fabrication, storage, and shipment data. Also, a copy of the data placed in the WPM DoD Internet website would reside in this notebook. WPM DoD Internet website file and documentation maintenance and availability is the responsibility of the WPM Site Custodian.

e. At least once a month, the WPM Site Custodian should make a print, or burn, of each of the WPM marking devices they have on hand (e.g., IPPC-HT, IPPC-DUNNAGE, and “DoD Pest Free”). From these prints or burns they will determine if the marking is readable, if the lettering and numbers have crisp edges, and if there are rips, tears, or missing letters/numbers. If any of the WPM devices are defective, then a new marking device should be acquired locally. LOGSA PSCC supplies the first marking devices in order to ensure the quality and correctness of the marking devices. The color of the marking ink will be black. The stamp should be a minimum of 1.5- x 3-inch. The ISPM #15 IPPC logo is a minimum of ½- x 1.5-inch. The letters and numbers in “US DoDAAC (installation’s activity address code, e.g., W91QUS (Fort Huachuca, AZ))” should be a minimum of 5/16-inch high. “HT and DOD” should be a minimum of 3/8-inch high. Several countries have frustrated incoming shipments due to poor quality stamp markings. Poor HT quality stamp markings could be the result of worn rubber stamps, or poor workmanship.

f. Installations that construct or repair WPM products utilizing compliant lumber acquired commercially shall mark the products they construct or replacement lumber components using the WPM treatment code and their DoDAAC. This only applies to repairs if the entire original WPM product was in compliance with ISPM 15.

g. Ammunition WPM boxes and pallets should have their required preservative applied after the WPM has been HT or MB (Methyl Bromide, another lumber treatment approved to exterminate the pine wood nematode) treated and marked. Other markings on each side of wooden ammunition box, or outer facings of the two outer stringers, or posts of pallets may be wood preservative treatment identification codes. The letters PA are marked on all boxes/pallets subjected to copper-8-quinolinolate (PQ56) preservative (Paragraph 3.8 of MIL-B-2427G, dated 3 Aug 1984, and/or paragraph 3.4 of MIL-P-15011, dated 16 Sept 1985). The letters PB are marked on all WPM subjected to zinc naphthenate emulsifiable (M-Gard W550) preservative treatment (Paragraph 3.8, MIL-B-2427G, dated 3 Aug 1984). The letters PC should be annotated on all WPM subject to copper naphthenate (M-Gard W510 or Cunapsol 5) preservative treatment (paragraph 3.8, MIL-B-2427G, dated 14 Jul 1989). PE is an acronym for wood preservative Tanalith E. Tanalith E3492 (copper carbonate) is used by the Israeli Defense Forces on their ammunition WPM. Military specification MIL-B-2427G, Amendment 9, dated 21 May 2002, new paragraph 3.10 Heat Treatment (Grade A and B only), states that Grade A

Army WPM Self-Certification Guide

boxes shall be fabricated from wood that has been heat treated and that the “heat treatment shall take place prior to preservation application” and that each wooden box shall be marked to show conformance to ISPM 15, the IPPC standard.

2. Site WPM library. The WPM Site Custodian will maintain up-to-date copies of the following documents in a 3-ring WPM notebook folder. On an annual basis, the WPM Site Custodian will check the required document listing noted on the DoD WPM Internet website to maintain an up-to-date WPM library. Revised documents will be replaced and old document discarded.

a. International Standards for Phytosanitary Measures (Publication No 15) (ISPM 15): Guidelines for Regulating WPM in International Trade, dated March 2002. Available at: <http://www.aphis.usda.gov/ppq/wpm/index.html> (scroll down “PPQ MENU” to “Wood Packaging Material Program” click on topic); <http://www.aphis.usda.gov/ppq/wpm/export/treatment-programs.html> (click on “HT Program” or “MB Fumigation Program”), or click on “Wood Packaging Materials Home” under “Search” Icon. Check out “Import Information and Export Information”.

b. American Lumber Standard Committee, Incorporated, WPM Enforcement Regulations, dated November 11, 2005. Available at: <http://www.alsc.org>, click on “Wood Packaging Material Program” square (bottom of screen), click on “WPM Enforcement Regs” (upper left side of screen).

c. American Lumber Standard Committee, Incorporated, WPM Policy, dated November 15, 2002. Available at: <http://www.alsc.org>, click on “Wood Packaging Material Program” square (bottom of screen), click on “WPM Policy” (upper left side of screen).

d. Export WPM Fumigation Policy, dated August 2005. Available at: <http://www.nwpca.com/ExportTreatment/ProgramOverview.htm>, click on “POLICY” (blue color) after “WPM Fumigation Program POLICY” center of the screen.

e. Export WPM Fumigation Enforcement Regulations, dated August 2005. Available at: <http://www.nwpca.com/ExportTreatment/ProgramOverview.htm>, click on “ENFORCEMENT REGULATIONS”(blue color print) after “WPM Fumigation Program POLICY center of the screen.

f. DoD 4140.1-M, DoD Compliance for Defense Packaging: Phytosanitary Requirements for Wood Packaging Material, dated 12 January, 2006. Available at the DoD Publications website. <http://www.dtic.mil/whs/directives/corres/pub1.html>.

g. Memorandum of Understanding between the U.S. Department of Agriculture Animal and Plant Health Inspection Service and the DoD, DoD WPM Program, dated 16 Nov 05. Available at DoD WPM website. <https://tarp.navicp.navy.mil/wpm>.

Army WPM Self-Certification Guide

h. 7 CFR (Agriculture), Chapter III, Part 319.40-3 (Foreign Quarantine Notices), [Docket No. 02-032-3], Federal Register Volume 69, Number 179, pages 55719-55733, dated September 16, 2004. ((7 CFR Ch. III, dated January 1, 2006 edition.)). Available at http://www.access.gpo.gov/nara/cfr/waisidx_06/7cfr319_06.html.

3. WPM training. All those involved with the DoD WPM Program must take the US Navy-operated DoD Internet WPM website training course. Personnel shall retake this training once every 2 years. This includes the WPM Site Custodian, logistics supervisors, Quality Assurance (QA) personnel, wooden box and crate makers, packers, receiving and shipping personnel, and the locally appointed WPM Site Auditor(s). This training provides background information on the WPM Program, the causes of pest infestation, and required local actions to mitigate pest infestation in international shipments. If WPM functionals do not have a CAC card Site Custodian will provide access using his/her card to WPM Internet website for them to take WPM certification training. Copies of successful individual completion certificates shall be provided to the WPM Site Custodian who will be responsible for retaining a copy of each person's record in a large 3-ring WPM file holder. The WPM Site Custodian will be responsible for deciding on the personnel who must take the WPM training. Internet WPM training is available at the following site: <https://tarp.navicp.navy.mil/wpm> (Military webpage) or <https://www.icptarp.com/wpm> (Commercial webpage). Click mouse on "Start Here" (Block in center of webpage.) After read through the instruction steps, click mouse on "WPM Certification Training and Registration."

Note. After completing the WPM training course, each trainee will **print out the completion certificate**. The trainee will retain the original printed certificate and give a copy to the activity WPM Site Custodian for training records.

4. Supply Discrepancy Reports (SDR, SF 364). The site WPM Site Custodian will retain copies of documentation associated with reported HT marking discrepancies. They may be in a separate 3-ring binder or have an SDR section in a 3-ring WPM binder. This binder or section includes non-conforming WPM SDRs reported on SF 364s, Shipping and Packaging SDRs; and SF 368s, Transportation SDRs. This includes SDRs others prepared against the activity and those SDRs the installation prepared against discrepant lumber and WPM product receipts (local and Government). SDRs are prepared in accordance with AR 735-11-2, Reporting of Supply Discrepancies; and AMC-R 735-5, Processing SDRs at AMC Accountable Supply Distribution Activities and Depots, appendices A and B. The WPM Site Custodian, in concert with the activity SDR Registrar, will establish and maintain a WPM SDR register that is a copy of the activity SDR register for non-conforming WPM discrepancies, only. The discrepancy code for lumber shipments will be: "L2- Not treated in accordance with specification". The discrepancy code for non-conforming WPM products will be: "P215- Non-conformance to specified requirements for wood packaging materials (WPM). Both can be found in AR 735-11-2, appendix D, Typical Shipping and Packaging Discrepancies Listed by Discrepancy Code. Receipts of lumber and WPM products are considered discrepant if not marked with ISPM 15 approved HT or MB markings.

Army WPM Self-Certification Guide

a. The WPM SDR register section will serve as the WPM Site Custodian’s basic working file for determining the current status of each WPM SDR. It will be maintained to ensure ease of locating SDR paper work for status purposes.

b. Pictures of discrepancies observed and noted in locally developed SDRs should be taken if possible. Pictures of the discrepancy should be forwarded with the SDR and an SF 1080 (Voucher for Transfer between Appropriation and/or Funds), and a copy of the same picture(s) should be retained in the WPM Site Custodian SDR document file. WPM Site Custodian will be responsible for investigating reported WPM discrepancies plus developing and implementing a corrective course of action. The installation plan of action must have procedures that would preclude noted discrepancy from reoccurring in the future. This documentation must be available for review and audit by the local AMC WPM audit representative. SDR specifics may be found at:

- (1) Instructions for filling out an SDR (SF 364): See AR 735-11-2, appendix B.
- (2) SDR distribution: See AR 735-11-2, appendix C.
- (3) Electronic filling: Use Army Electronic Product System (AEPS), <https://aeaps2.ria.army.mil/aepphome.cfm> (Enter with AKO login or CAC authentication. New user may need a WEBSDR login and password.)
- (4) For help or guidance in completing SDR process, to include using AEPS:

Item Manager	RICs	DSN Phone Number			
		All SDRs	Shipping	Packaging	FMS
All (Patrice Burklund) TACOM-RI	N/A			793-5396	
AMCOM	B17/B64		746-5491	746-3874	788-7887
CECOM	B16/B46		992-4839	992-5157	
JMC	B14	793-1541 793-3772			
SBCCOM	A12		793-5396	256-5565	
TACOM-NAMI (i.e., DLA, GSA, Vendor, etc)	SMS/AJ2	793-5091			
TACOM-Rock Island	B14/AKZ		793-5396		
TACOM-Warren	AKZ			786-5432	

5. Contracts and Procurement. The WPM 3-ring notebook will include a copy of the wording that is included in each lumber or WPM product procurement contract to ensure that lumber receipts and WPM products meet the UN ISPM 15, Host Nation, and/or DoD 4140.1-M, HT or MB treatment and marking requirements. The WPM Site Custodian

Army WPM Self-Certification Guide

must ensure that following contract language is used in all WPM-related (i.e., lumber, pallets, etc.) contracts:

“In accordance with the requirements of International Standards for Phytosanitary Measures (ISPM 15), the following commercial heat treatment process has been approved by the American Lumber Standards Committee (ALSC) and is required for all Wood Packaging Material (WPM) products and lumber used by DoD activities. WPM is defined as wood pallets, skids, load boards, pallets collars, wooden boxes, reels, dunnage, crates, frames and cleats. Packaging materials exempt from the requirements are materials that have undergone a manufacturing process such as corrugated fiberboard, plywood, particleboard, veneer and oriented strand board (OSB). All WPM shall be constructed from Heat Treated (HT to 56 degrees Centigrade (Celsius, or 133 degrees Fahrenheit) for a minimum of 30 minutes at the core) lumber and certified by an accredited agency recognized by the ALSC IAW WPM Policy and WPM Enforcement Regulations (see URL: <http://www.alsc.org>). All materials must include treatment certification markings IAW the ISPM 15 and/or ALSC standards and be placed in an unobstructed area that will be readily visible to inspectors. Pallet markings shall be applied to the stringer or block on diagonally opposite sides and ends of the pallet and be contrasting and clearly visible. Container certification marks shall be applied in a visible location, next to identification markings, on at least two opposite sides of the wood packaging product. All dunnage used in configuring and/or securing a load shall also comply with ISPM 15 and be marked with an ISPM 15 and /or ALSC approved DUNNAGE stamp once every 2 feet. Failure to comply with the requirements of this restriction may result in refusal, destruction, or treatment of materials at the point of entry.”

If above statement is not in existing contracts for lumber and WPM products the contracts shall be modified to include the above language.

6. Activity WPM SOPs. The activity WPM Site Custodian in concert with QA, supply, and shipping managers must develop receipt, storage, fabrication/repair, and shipping standing operating procedures (SOP) for HT lumber and finished fabrication/repairs product storage and shipments. The following are basic guidelines or procedures that should be in an installation's SOP. Installation specific processes or procedures should be added.

a. Procurements: Present lumber and WPM Product contracts must be reviewed to ascertain if heat treatment and marking certification requirements IAW ALSC grading, or ISPM 15 and DoD 4140.01-M-1 have been inserted into procurement contracts. If not, have local procurement personnel add the lumber HT requirements into the next or follow-up procurement contracts. WPM Site Custodian and local QA personnel (or activity WPM Site Auditor) should periodically audit lumber and WPM product contracts (to include Government House Hold Goods stored and shipped in wooden boxes and crates) to ensure lumber meeting DoD WPM Program requirements are being procured and used in container fabrication.

Army WPM Self-Certification Guide

b. Receipts:

(1) Lumber. There should be, if not already formalized, an inspection check for lumber receipt processing in the installation supply SOP. There should be a specific requirement for the receiver (Materials Examiner and Identifier), Material Handler, Wood Worker, or Supply Clerk to temporarily lift cover off lumber and check lumber for lumber grade and HT (KD/HT) or methyl bromide (MB) mill certification marking.

(a) Treated lumber (HT or MB) **does not** have the same certification markings as certified WPM. Raw lumber must meet the grading, thickness and width characteristics rules that conform to the American Softwood Lumber Standard PS 20, or the National Hardwood Lumber Association rules for grading American hardwoods. There are currently 30 accredited independent third-party lumber audit agencies headquartered throughout the United States and Canada that use lumber grading rules developed by 7 grade rules writing organizations that have final production requirements conforming to PS 20. These agencies are certified by the Board of Review of the American Lumber Standard Committee (ALSC). A majority of the accredited lumber agencies provide written rules and lumber grading only, several provide both grading and HT auditing services, while 8 of the ALSC accredited lumber agencies provide HT audit services only. The National Wooden Pallet and Container Association (NWPCA) have under the auspices of the USDA APHIS developed uniform, industry-wide inspection and treatment marking procedures for MB fumigation of lumber and WPMs. The MB lumber and WPM fumigation inspection agencies are accredited and monitored by the Export WPM Fumigation Enforcement Committee. It should be noted that while ISPM 15 recognizes two lumber treatment methodologies, the DoD preferred method of lumber treatment is HT.

(b) HT or Kiln Dried (KD) lumber markings (HT or KD/HT) **do not** contain the IPPC (International Plant Protection Convention) or 2-letter initials of country where processed (example: US). However, all lumber procured by Army activities must have HT or KD/HT markings on each piece of lumber and the markings must be readable, not faint or smeared. The minimum HT markings stamped, stenciled or branded on HT lumber will be as follows, or a similar variation; (1) processed, graded, HT and marked by same mill (2) only HT by a certified activity as lumber was graded and marked by another activity (mill) to reflect their finished lumber grading:

1 Milled, graded, HT:

TP	No.1	KD-19	TP - Inspection agency logo
000	HT	SYP	No.1 - Grade of lumber
			KD-19 - Lumber moisture content
			000 - Lumber mill number (usually from insp. agency)
			HT - Lumber has been HT to ISPM 15 requirements
			SYP - Species of lumber, Southern Yellow Pine

2 HT only:

TP	HT	TP - Inspection agency logo
		HT - Lumber has been HT to ISPM 15 requirements

Army WPM Self-Certification Guide

000

000 - Lumber mill number (usually from insp. agency)

U.S. HT treatment requirements, accredited lumber and lumber HT audit agencies and their markings can be found at Internet website: <http://www.alsc.org/>. Click mouse on “Lumber Program” (yellow block, middle of screen); scroll down left of screen to “Accredited Agency List”, click mouse on this title; scroll down to middle paragraph and accredited agencies and their markings. Lumber grading and marking enforcement regulation, “ALSC Lumber Program Enforcement Regulations”, is also found under <http://www.alsc.org/>. Click mouse on “Lumber Program” (yellow block, middle of screen); scroll down left of screen to “Enforcement Regs”; click mouse on this title; click mouse on “here.”, the last word on middle of screen, to review American Lumber Standard Committee, Inc., Board of Review, Enforcement Regulations, 27 October 2006.

(c) MB lumber markings **do not** contain the IPPC or 2-letter initials of the country where processed. Lumber can only be marked after fumigation and the MB treatment mark must be applied to every piece of lumber. Lumber treatment marking is not required for lumber that will be used for on-site WPM manufacturing (WPM product would receive the ALSC IPPC HT marking). For dunnage, the MB treatment mark must be applied every 24 inches. MB Dunnage mark **will have** the IPPC logo, 2-letter country processing identification, and for Army installations, their DoDAAC. The facility must designate a defined area for MB treated dunnage and lumber that is segregated from unmarked dunnage and lumber. The MB lumber marking shall be legible and have the following minimum information in the treatment mark whether stamped, stenciled or branded (tags not permitted):

000 - Unique number assigned by the inspection agency to the fumigation or lumber facility.

000 MB Logo

MB - The “MB” abbreviation for methyl bromide fumigation.

Logo - The identifying symbol, logo or name of the inspection agency.

U.S. MB treatment requirements, accredited lumber and lumber HT auditing agencies can be found at Internet website: <http://www.wnpca.com>. Click mouse on “Resource Center”, title located right side of NWPCA homepage. Scroll down new listing and click mouse on “Export Treatment Methods”, then click mouse on “Fumigation”; scroll down listing on right of new page to “List of Accredited Inspection Agencies”, click mouse on this title. The MB enforcement regulation can be found at <http://www.nwpca.com/ExportTreatment/ExpWoodPackMatFumigEnfoceRegs8-2005.pdf>. MB treatment policy document can be found at <http://www.nwpca.com/ExportTreatment/ExpWoodPackMatFumigPolicy8-2005.pdf>

If treated at an OCONUS HT or MB facility, WPM Site Custodian will have to check with the NPPO in that country to obtain certified lumber treatment facility names and numbers for receipt comparison purposes. If the required HT certification markings are not visible or readable on each piece of observable lumber, the shipment should be refused and an SDR developed and forwarded to the shipper/supplier. If required WPM

Army WPM Self-Certification Guide

HT markings are present and readable on lumber, then inspecting receiver should note on receiving document, "HT Certification Marked on Lumber, sign and date." A copy of the receipt document must be forwarded to the WPM Site Custodian for them to complete the AMC Lumber Receipt Log. Pictures should be taken to verify discrepancy and justify the SDR against supplier contesting installation refusal of receipt.

(2) Wood Products (e.g., wood boxes, crates, pallets, skids, drums, etc.). There should be, if not already formalized, an inspection check for receipt of materiel in, or on WPM products in the installation supply SOP for the Central Receiving Point, materiel return, reparable exchange, and turn-in section(s). Auditing WPM products for HT markings should be a standard turn-in check requirement for returnee and receivers. All materiel received in a wooden box or crate, on a pallet or a skid, must be audited to ensure that the item's WPM product is ISPM 15 or DoD 4140.1-M certified and marked as such. Receiving clerk, warehouseman, or materiel examiner who accepts turn-ins must note on receiving item documentation "Item received in HT marked and complaint lumber, sign and date." If receiver noted through visual inspection that WPM product holding and securing turn-in does not have the ISPM 15 HT treatment markings, the item should be forwarded and staged at the installation's wood box shop for fabrication of the required HT box or crate, or repacked on a HT certified pallet or skid. Installation WPM fabrication markings with HT lumber and DoDAAC should be applied next to item identification markings and on at least two vertical panel sides, preferably opposing vertical wood panels. WPM product fabrication cost should be billed to turn-in unit, but if that is not possible for a number of valid reasons, fabrication/repair costs for lumber, other materials (plywood), and labor should be charged to owning National Inventory Control Point under current SDR procedures (see paragraph 8).

c. Lumber storage: HT or MB lumber is to be stored at least 4 feet from non-treated lumber, or stored, not adjacent to other non-WPM products. HT/MB treated and certified/marked lumber, pallets, or WPM certified products should not be co-mingled, stored/stacked with non-HT certified lumber or products.

d. Fabrication or Repairs (WPM Product):

(1) Government employee/contractor who fabricates WPM products, such as a wooden box, crate, pallet, etc., should be the person responsible for completion of the AMC WPM Fabrication Work Order form and marking of the finished product with the installation WPM HT certification. This will signify to others that lumber used had been treated to ISPM 15 requirements and product can be accepted as ISPM 15 (DoD 4140.1-M and/or Host Nation IPPC) certified and compliant. As a minimum requirement and as previously noted, the installation HT marking should be applied next to item identification markings on the container and on at least two vertical opposing panels. HT markings can be applied to all 4 box panels and the top if fabricators and Custodian establish that process as their marking SOP. Fabricators and/or packers should also be stenciling or labeling MIL-STD-129 identifications markings and special handling requirements, if required, at the appropriate area on container exteriors. Packed and marked item should be forwarded to storage or to the shipping area/building.

Army WPM Self-Certification Guide

(2) Government employee/contractor who repairs WPM products, such as a wooden box, crate, pallet, etc., is the person responsible for marking the repaired or replaced part with the installation WPM HT certification. This will signify to others that lumber used had been treated to ISPM 15 requirements and the replaced part can be accepted as ISPM 15 (DoD 4140.1-M and/or Host Nation IPPC) certified and compliant. Packed and marked item should be forwarded to storage or to the shipping area/building

(3) Cut lumber not immediately used in certified WPM fabrication. In all WPM fabrication facilities, there are “off-fall” pieces of lumber remaining after the full length board has been cut. If a piece, or pieces of lumber (1" x 6" x 8', 2" x 4" x 8', etc.) are left over from WPM fabrication then that part of lumber not immediately used should be marked in one or more places with the installation WPM HT marking. The lumber should then be placed and stored in a location where its use would not be documented for future fabrication of new WPM box, crate, etc., and that it would not be confused or mixed with non-compliant lumber. Use of “off-fall” lumber is not counted as lumber consumed when it is finally used in fabrication. This is based on the fact that the entire board should have been documented as “consumed” when the first cut was made.

e. Blocking and Bracing (B&B)/Dunnage: If B&B is part of the construction of the wooden box or crate (nailed or stapled to lumber or plywood) then the cut lumber does not have to be individually certified with installation HT markings, because it is part of the container. If lumber is used as loose B&B (dunnage) in a container, on a pallet, skid, transport platform (flat bed trailer or rail car) then the lumber IAW ISPM 15 must be marked with installation HT certification markings every 2 feet, or at least once on the visible side.

f. Shipping: The installation shipping point or points is the last functional area to observe and visibly inspect WPM products, pallets, skids, etc., for HT certified markings. The installation Transportation Officer or his/her representative should have an SOP assignment to check and verify the presence of an HT certification marking on all WPM used to ship materiel from the installation. If HT certification marking are not readable or present on any vertical panel, the container and its contents should not be offered for shipment. WPM product contents will be removed to supply, preferably to the wood box shop for corrective disposition. If there is a WPM SDR against the installation [identified by HT DoDAAC marking] then the ITO should be involved in developing and signing off on a WPM SDR corrective plan of action and SOP changes to prevent WPM discrepancy repeat from that installation.

7. “Pest Free” WPM product certification markings:

a. The DoD Certified “Pest Free” marking was an interim marking approved by the European Union (EU) countries during the initial implementation period for WPM treatment and marking. Using LOGSA PSCC supplied data; the EU IPPC approved the use of the DoD Certified “Pest Free” marking for WPM products that would be used to ship materiel into, or amongst European Community (EC) Nations. The EU agreed to

Army WPM Self-Certification Guide

allow the U.S. DoD, the services, and DLA, to use visual inspection procedures and a moisture test to determine if lumber in storage, or used in the fabrication of WPM products and stored at DOD installations world-wide held no pests, specifically the pinewood nematode (PWN). The EU never intended to allow the DoD Pest Free marking and visual inspection process to be a replacement for the ISPM 15, HT or MB treatment and markings. The EU communities assumed that after a period of years the U.S. DoD should be able to rid their storage sites of untreated WPM products and then meet the ISPM 15 lumber treatment and marking requirements. There would be no “Grandfathering” of the HT or MB lumber treatment requirement. The EU countries have allowed the DOD Pest Free mark to be used on previously packed and stocked DoD materiel until 31 December 2007. After that date, the DoD Certified “Pest Free” mark would not be allowed to be used as a substitute for certified ISPM 15 markings (HT or MB) in EU shipment receipts or intra-EU country shipments.

b. Existing non-certified and unmarked stock, packaged within or residing on WPM may be eligible for the Pest Free marking certification. This certification, at this time, is only for shipments to and amongst non-IPPC signatory countries, countries who are not enforcing IPPC requirements, CONUS shipments to DRMO, and CONUS shipment where there is no chance of the materiel being reshipped OCONUS or to another DoD Component. Certification and application of the DoD Pest Free marking is only authorized if the material successfully passes the following moisture and visual inspection standards.

(1) If date of pack(s) is greater than 5 years, then the lumber must: be bark free, have no insect bore holes larger than 3 mm (under 7/32-inch), and show no evidence of other insect infestations.

(2) If date of pack(s) is less than 5 years, then the lumber must: be bark free, have no insect bore holes larger than 3 mm (under 7/32-inch), show no evidence of other insect infestations, and have a moisture content of 19 % or less.

c. If DoD stock passes the above inspection criteria, the Certified DoD “Pest Free” marking with the inspecting site’s DODAAC can be applied to WPM products securing, or holding such stock. If the WPM does not pass the above visual and moisture inspections then the stock must be repack in or on compliant WPM prior to shipment. Inspections can be performed by anyone who has taken the WPM Internet training course; has the competence to use a moisture meter; has the skills and ability to completely and accurately fill out Government forms; and has been assigned the duty by the Wood Shop supervisor or the WPM Site Custodian. This inspector can be the WPM Site Custodian, or someone appointed by the custodian to perform this function, must fill out an appropriate, sequentially numbered “Pest Free” log data book, initial and date the log. He, or the fabricator, must stencil “Pest Free” marking data on the WPM product, along with the corresponding “Pest Free” log number. This data is provided to the WPM Site Custodian so that they may place in a WPM notebook.



d. The DoD “Pest Free” marking and certification conditions was, per USDA APHIS, between the DoD and the EU, with no input from APHIS. However, USDA APHIS has prevailed upon the US Department of Homeland Security, Customs and Border Patrol to accept the markings on retrograde (all Classes, including V and IX) imports into the U.S.

e. The activity WPM Site Custodian will maintain a DoD “Pest Free” Marking Log Data book on all WPM inspected and marked as such. WPM products that have been inspected and certified/marked as “Pest Free” should be stored in areas that an Auditor, installation QA person, or outside WPM Site Auditor would be able to visually inspect the WPM product and the DoD “Pest Free” markings. Again, the “Pest Free” marking should be stamped next to the materiel identification markings (MIL-STD-129 shipping container markings) and on two opposing vertical panels. Moisture meters can be procured via the Internet. They should:

(1) Be pin or probe type meters. Safety of radio frequency models cannot be verified for all ammunition. Hammer type probes are recommended for greater durability, but are not mandatory.

(2) Have species correction. A chart for conversion from instrument reading to moisture content will come with the product. Models that don’t require this step are less accurate.

(3) Have temperature correction. Models without are less accurate.

(4) Have accuracy of 2 percent moisture content or better.

(5) Be able to read a moisture range of 6-25 percent.

(6) Be able to recharge the model by battery replacement or other means.

f. WPM self-certified sites will not mark new fabrication WPM products with the DoD Certified “Pest Free” stamp. If those WPM products were previously fabricated using ALSC certified HT lumber within the local fabrication facility, the facility has retained custody of the WPM, and the supporting documentation is on file; then the site may self-certify using their WPM IPPC Certification mark. If the fabrication facility had used the DoD Certified “Pest Free” markings, then those markings will be obliterated.

Army WPM Self-Certification Guide

The important factor is the custody of the WPM and proving the activity's unconditional knowledge of the WPM's fabrication with 100% ALSC certified HT lumber.

8. Costs for repacking into or onto compliant WPM are situation dependant. The following is a brief explanation of the most common situations:

a. Receiving. If repacking is required due to receipt of non-conforming WPM, then an SDR will be prepared and the costs will be as determined based on the SDR Program procedures.

b. Storage. If repacking is required due to the deterioration of the WPM containing the materiel in storage, then it will be included as a cost of repackaging the item under the Stock Readiness Program. Non-conforming containers will not be the sole reason behind repackaging the item. The local Stock Readiness Coordinator will determine eligibility in case of a dispute.

c. Shipping. Repacking required prior to a shipment being offered for transport.

(1) CONUS. If compliant WPM is available, it will be used. If the WPM is non-compliant and the shipment is to freight forwarder (i.e., Defense Distribution Center (DDC)-Susquehanna Site, etc.) then the shipment is considered OCONUS and will fall under the procedures below for OCONUS shipments. There should be very few other instances where compliant WPM is required for CONUS shipments.

(2) OCONUS. Stock Readiness Program funds will pay for repacking of known OCONUS shipments in compliant WPM products.

d. Maintenance.

(1) Repair and Return Program. No repackaging is authorized for Repair and Return Program items in the normal course of business based on the items being locally issued and not shipped.

(2) National Maintenance Program. If items are processed through the maintenance shop under a National Maintenance Requirement Directive (NMRD) to be restored to a serviceable condition, then compliant WPM will be included as part of the preservation and packing costs paid for by the DMRD MIPR. Items will only be considered for issue once they are packaged to include WPM compliant.

NOTE: If the installation does not have the capability to repack non-compliant WPM into or onto compliant WPM and the materiel is going to a DLA site (e.g., DDC-Susquehanna Site) prior to OCONUS export, then send the materiel as soon as possible to the DLA site so they may repackage the materiel. Shipper must notify the Army WPM Program Manager by email at toby.pt@us.army.mil. AMC will be charged for the repacking and DLA will prepare an SDR based on the non-compliance. More than two

Army WPM Self-Certification Guide

SDRs per month for the same shipping activity will be cause for questioning as to why the organization is unable to provide conforming WPM.

9. Installation WPM records. The WPM Site Custodian is responsible for entering and maintaining a WPM “Pest Free” Marking Log, AMC Lumber Receipts Log, AMC WPM Fabrication Work Order, AMC Lumber Usage Log, and completion of an Internet website AMC WPM Lumber Usage Report. These data collection logs or forms are similar to the logs that ALSC accredited auditors require from CONUS WPM fabrication and repair sites that they audit. The contents of these logs will periodically be reviewed by the WPM Site Auditor (see paragraph 10.a.).

NOTE #1: Background information on lumber sizing: When referring to a specific piece of lumber, the nominal sized is used. The following explains nominal and actual sizes of lumber:

- “Nominal Size” is the size of a piece of lumber before it is dressed and seasoned. It is used to designate a particular size of lumber, such as 2” x 4”, 2” x 6”, etc. It is the method of calculating price when ordering and buying lumber.
- “Actual Size” of lumber refers to minimum acceptable size after the lumber has been dressed and seasoned. A nominal 2” x 4” can have a minimum actual size of 1.5” x 3.5”.

NOTE #2: Background information on board feet; the unit of measure used for ordering and buying lumber. Board feet are a measurement of lumber volume determined using nominal size dimensions. One board foot is equal to 144 cubic inches of wood. Calculate using the following formula: (Thickness in inches x Width in inches x Length in feet) / 12 = Board Feet.

a. DoD “Pest Free” Certification Log. See paragraph 8. Each installation can develop and maintain their “Pest Free” Log Data form. Inspector and custodian should each have a copy of the WPM product inspection.

b. AMC Lumber Receipts Log

(1) The receiver, or receiving stock clerk, must make a copy of each lumber receipt for the WPM Site Custodian. This should be a receiving SOP action. The WPM Site Custodian may also want to be informed by the procuring installation supply clerk, if a volume of lumber is being delivered to the installation. WPM Site Custodian may want to inspect the lumber to ensure that it is marked as HT or MB treated by a certified entity. The WPM Site Custodian will fill out the AMC Lumber Receipts Log once they receive a copy of each lumber receipt listing. On this form it is important to note lumber size, length, width, and height (thickness) and pieces of each size lumber received.

(2) Copies of lumber receipts, sizes received, should be placed in a folder and retained for 2 years. If there are problems with data in the future, a WPM Site Auditor may wish to examine actual lumber receipt papers. This data, or a summary of monthly receipt data, will be used for completing the Army Lumber Usage Log.

Army WPM Self-Certification Guide

c. Army WPM Fabrication Work Order. The Army WPM Fabrication Work Order should be similar to a form that installation wood shops or carpentry shops should now be using for reimbursable work, or fabrication work performed for installation supply support activities (SSA) or tenant activities. This form is just a little more detailed on lumber used and lumber cut.

(1) The Shop Supervisor should fill out the top of the form with the Julian date and a wood shop work order number that should be a sequential number. He may direct a Sawyer or Fabricator in the shop to fill in the data required at the top center of the form.

(2) The “Sawyer”, a person who saws the lumber to required dimensions, would fill out raw lumber cut dimensional columns, lumber NSN/ID number and HT mill code columns. When they are finished cutting lumber pieces required for a wooden box, crate, pallet, etc., they sign their name in the Sawyer’s name and signature block. In all WPM fabrication facilities, there are scrap pieces of lumber cut to square the ends of the board and to remove knots and checks. In order to simplify the accounting for scrap wood and “off fall” pieces, the entire board will be documented as “consumed” when the first cut is made. Use of “off-fall” lumber is not counted as lumber consumed when it is finally used in fabrication.

(3) The “Fabricator”, a person who fabricates or assembles a wooden box, crate, skid, pallet with lumber cut by the Sawyer, would fill out the component dimensional columns. When the Fabricator has completed fabricating or repairing a WPM product he/she would sign the Fabricator’s name/signature block on the same form. Fabricator is the person who would also stamp the installations HT markings with their DoDAAC on two opposing sides of the product fabricated. The Fabricator will also stencil below the installation HT stamp/marking his/her identification markings (see instructions for Fabricators markings on lower right hand corner of WPM work order form). This marking will be used to identify who fabricated the WPM product and when it was fabricated if there are quality or fabrication discrepancy problems at a later date in shipment or storage. Fabricator at the end of the day will turn in all fabrication work orders to his supervisor.

(4) The Shop Supervisor will review the form for accuracy and completeness. After his/her review they also will sign the WPM fabrication work order, make a copy for their files, and then forward the original to the WPM Site Custodian.

(5) The WPM Site Custodian should review the data to ensure that the form is completely filled out and data appears to be accurate. If provided data is questionable, the WPM Site Custodian should quickly contact the wood box Shop Supervisor so that the Fabricator or Sawyer can be questioned on data while work performed is fresh in their memories. WPM Site Custodian will need this data to fill out the Army Lumber Usage Log. WPM Site Custodian should also have a folder for fabrication work orders. These should be retained for 2 years. These forms will be periodically reviewed by a WPM Site Auditor.

Army WPM Self-Certification Guide

d. Army Lumber Usage Log This log form should be fairly easy to fill out by the WPM Site Custodian. They will have to add up and summarize the amount of lumber used each work day by the WPM Fabricator or wood product repair person. If a Sawyer or Fabricator is repairing a wood box, pallet, or skid with HT lumber he may be requested to fill out this form vice a WPM fabrication work order. This form should also be used for lumber that is used as dunnage, or blocking and bracing lumber used to secure an item inside a container, or on a pallet/skid and is not part of the initial fabrication. The WPM Site Custodian would take the forms filled out for the day and develop their “Army Lumber Usage Log” for each day, so that at the end of the month or each week they could note the lumber sizes used and quantity of each used. The quantities of lumber the custodian quantifies for the month should be compared to total receipts for each dimensional size used. If the numbers don’t seem correct, compared to lumber in storage, it’s time to recheck data supplied by wood fabrication and repair workers. These forms should also be retained in a separate folder and kept as installation records for 2 years.

e. DoD Monthly Internet Website Data Reporting. It is the responsibility of the WPM Site Custodian to enter the monthly HT receipt and usage data into the Navy’s Internet DoD WPM website at, <https://www.icptarp.com/wpm> or <https://tarp.navicp.navy.mil/wpm>. The required WPM data must be entered into the website database by the WPM Site Custodian by close of business (COB) 14 calendar days after the end of each month. It is the responsibility of the Army WPM Program Manager to review and validate the monthly reports. If any problems are found with recorded data, the Army WPM Program Manager and the WPM Site Custodian will discuss and correct any point of contention, or discrepancy. Note that nothing has been stated about shipments, as WPM products and the items they hold or support/secure in storage for shipment, may not be shipped for a long period of time. The WPM Internet receipt and usage form is just an expansion, a consolidation of the local forms. If the WPM Site Custodian has maintained WPM lumber receipt and usage forms by the dimensional sizes of the lumber they should have no problems filling out this form via the Internet. WPM Site Custodian does not have to figure out dimensional lumber board feet. The calculation of board feet for each size lumber has been built into the spread sheet data completion.

10. Installation WPM audits. The Army WPM Audit Program will be maintained so as to comply with ISPM 15 and DoD 4140.1-M. WPM audit goals are to ensure correct and responsible use of the IPPC certification marks and DoD “Pest Free” certification mark. Army procedures to audit and inspect the Army Self-Certification WPM program shall be followed. The WPM audit procedures and checklist have been developed to effectively monitor, enhance, and ensure compliance at each Army-managed WPM fabrication; repair and shipping point see Appendix A.

a. WPM Site Auditor. The installation audits shall be conducted using trained, independent, impartial WPM inspector(s). WPM Site Auditor(s):

Army WPM Self-Certification Guide

(1) Must be a Government employee (e.g., Department of the Army Civilian, Army Soldier, etc.) appointed in writing by the commander, or manager of the installation

(2) May be either of the following:

(a) Division Supervisor, a QA Specialist, or an AMC Logistics Assistance Representative (LAR) or someone in a similar capacity at each participating installation that is a Government-owned and Government-operated facility.

(b) Contracting Officer's Technical representative or assigned by the Contracting Officer at each participating installation that is a Government-owned and Contractor-operated facility.

b. Auditors name, position, mailing and email address, and phone numbers will be provided to the Army Program Manager. Auditors shall have taken the DoD WPM training available on the Navy's Internet WPM training website. He/she shall have a copy of, and be familiar with, the content of the WPM documents in paragraph 2, above. WPM Site Auditor will perform an initial audit and then a subsequent audit each year or sooner if required due to discrepant shipments. The WPM Site Auditor will use the WPM Audit Checklist at appendix A. The Army WPM Program Manager (LOGSA PSCC) will inform the Auditor when to perform the yearly audit. Within 2 weeks of the audit, they shall forward the checklist audit and a short summary of findings to the Army WPM Program Manager. The WPM Site Custodian and others in local chain-of-command shall be courtesy copied. The WPM Site Auditor shall also be informed if a WPM SDR is received against the installation. In concert with the WPM Site Custodian, the auditor shall investigate the SDR, determine the cause or reason behind the SDR, and develop a plan of action to correct cause of discrepancy.

c. Consequences of shipment audit failure (non-conformance to WPM requirements at an aerial, surface shipment, a container consolidation point (CCP), or from a reported and validated SDR).

(1) First audit failure or reported non-compliance to ISPM 15 or DoD 4140.1-M, the site WPM Site Custodian and local WPM Site Auditor shall provide a written analysis of the reported problem and forward proposed solution to the Army WPM Program Manager (LOGSA PSCC). An analysis of the incident and report will be completed and forwarded within 15 days of receiving notice of WPM non-compliance. The Army WPM Program Manager will inform the Army WPM POC of the problem and corrective actions. The WPM Site Auditor shall perform a WPM checklist audit (using the annual audit checklist) within 30 days after the response was forwarded to the Army WPM Program Manager. The auditor is to verify that process improvements have been implemented and are sufficient to resolve the discrepancy.

(2) Second audit failure within 60 days of the first non-compliance notification requires that within 15 days of 2nd failure notification, the WPM Site Custodian and local WPM Site Auditor shall provide a written analysis of the reported problem and forward a

Army WPM Self-Certification Guide

proposed solution to the Army WPM Program Manager (LOGSA PSCC). The site will be re-audited within 60 days of the receipt of the report by the Army WPM Program Manager or a special auditor. Purpose of this re-audit is to verify that the installation has implemented internal process improvements that will prevent reoccurrence of reported discrepancy.

(3) Third audit failure within 60 days of the first non-compliance notification requires that the installation cease WPM fabrication or repairs, and application of site self-certification WPM markings to WPM products used in materiel storage and shipment. Installation personnel must have their WPM training certificates voided. The WPM Site Auditor will confiscate all marking devices. Installation will have to find and pay for alternative suppliers of certified WPM products that would be used for installation storage and shipments. Installation will be responsible for repack and/or demurrage costs. One year after date of third audit failure, installation may reapply for DoD-Army WPM site re-certification. All wood fabricators/packers, etc., shall retake the Internet WPM training so that they and their site can be re-certified. The Army WPM Program Manager will assist installation in re-obtaining WPM site self-certification. Installation must have developed a plan of action and internal SOP to ensure discrepancies resulting in the forfeiture of using a DoD IPPC certification mark will not reoccur. The Army WPM Program manager will review the corrective procedures prior to allowing the installation to start WPM re-certification. Once the recertification is approved, the WPM Site Auditor will return the marking devices to the WPM Site Custodian.

11. LOGSA PSCC is the Army Materiel Command's and Army's WPM Program Manager. The LOGSA PSCC WPM POCs are always available for WPM guidance and assistance in resolving installation program areas of concern. However, once an activity is WPM self-certified it is an independent activity responsible and accountable for procuring, fabricating and marking WPM products to relevant DoD/Army and the UN ISPM 15 requirements. The LOGSA PSCC role changes if the installation is not in compliance and hasn't requested assistance. LOGSA PSCC is then the Army's WPM self-certification watchdog and will take actions necessary to protect the overall integrity of the Army and DoD WPM Program. LOGSA PSCC may be contacted by email at toby.pt@us.army.mil.

Appendix A
Army WPM Self-Certification Site Auditor's Checklist

DODAAC: _____
SITE: _____
LOCATION: _____

SITE AUDITOR'S CERTIFICATION STATEMENT—

I _____ hereby certify that the above named installation meets or exceed the requirements established in DoD Manual 4140.1-M-1, Compliance For Defense Packaging: Phytosanitary Requirements For Wood Packing Materials. As such they are authorized to certify WPM and apply the DoD WPM markings for export.

SITE AUDITOR'S SIGNATURE
TITLE: _____
ORGANIZATION: _____
ADDRESS: _____

DATES OF AUDIT: _____

SITE CUSTODIAN CERTIFICATION STATEMENT—

I _____ hereby certify that the above named installation meets or exceed the requirements established in DoD Manual 4140.1-M-1, Compliance For Defense Packaging: Phytosanitary Requirements For Wood Packing Materials. As such they are authorized to certify WPM and apply the DoD WPM markings for export.

SITE CUSTODIAN'S SIGNATURE
ORGANIZATION: _____
ADDRESS: _____

SITE CUSTODIAN SUPERVISOR

SITE CUSTODIAN SUPERVISOR'S SIGNATURE
NAME: _____
TITLE: _____

Appendix A
Army WPM Self-Certification Site Auditor's Checklist

WPM Site Custodian

Does WPM Site Custodian information obtained from DoD WPM website match who the site says is their DoD WPM Site Custodian? YES__ / NO__

Is the WPM Site Custodian assigned and appointed on memorandum by Installation Commander or their representative? YES__ / NO__

Quiz the WPM Site Custodian on latest WPM specific operations and procedures at the beginning of the audit. Did the Custodian demonstrate a working knowledge of the latest procedures? YES__ / NO__

Name: _____

Title: _____

Department: _____

Address: _____

Phone Number: DSN _____ COMM. _____

Email: _____

Does the WPM Site Custodian-

Maintain a daily log of raw lumber receipts? YES__ / NO__

Properly enter lumber receipt data from receipt document into log? YES__ / NO__

Option # 1

Maintain a daily log of cut and fabrication work orders? YES__ / NO__

Properly enter lumber usage data from work orders into lumber use log? YES__ / NO__

Maintain a file of work orders after entered into daily log? YES__ / NO__

Option #2

Have a local SOP for the positive accounting of lumber usage? YES__ / NO__

Have an inventory and monitor non-compliant WPM packaged items to ensure stock is issued within CONUS? YES__ / NO__

Comments: _____

Overall WPM Site Custodian Evaluation-GO__ /NO GO__

Appendix A
Army WPM Self-Certification Site Auditor's Checklist

WPM Training

Is there a site file containing the names and certificates of course completion for the DoD web-based WPM Training? YES___/ NO___

Is there a listing of the persons who have completed the course, their job title, and place of work? YES___/ NO___

Are the following individuals listed?

Sawyers? YES___/ NO___

Fabricators? YES___/ NO___

Blocker and bracers? YES___/ NO___

Packers? YES___/ NO___

Craters? YES___/ NO___

First line supervisors? YES___/ NO___

Team leaders? YES___/ NO___

Is there a current (within two years) copy of a Naval Supply Systems Command Certificate Of Achievement for each person? YES___/ NO___

WPM Site Custodian has prepared local instruction training? YES___/ NO___

WPM Site Custodian provides initial local training and provides remedial training as required for installation personnel associated w/wood box operations? YES___/ NO___

WPM Site Custodian annotated training log? YES___/ NO___

Comments: _____

Overall WPM Training Evaluation-GO___/NO GO___

WPM References

Is there a loose-leaf binder containing the following WPM references at the site that is easily available for all those who fabricate, repair, pack and consolidate pallets loads, wooden boxes and crates, skids, etc to read?

___International Standards for Phytosanitary Measures (Publication No 15) (ISPM 15): Guidelines for Regulating WPM in International Trade, dated March 2002.

___American Lumber Standard Committee, Incorporated, WPM Enforcement Regulations, dated November 11, 2005.

___American Lumber Standard Committee, Incorporated, WPM Policy, dated November 15, 2002

Appendix A
Army WPM Self-Certification Site Auditor's Checklist

___ Export WPM Fumigation Policy, dated August 2005.

___ Export WPM Fumigation Enforcement Regulations, dated August 2005

___ DoD 4140.1-M, DoD Compliance for Defense Packaging: Phytosanitary Requirements for Wood Packaging Material, dated 12 January, 2006.

___ Memorandum of Understanding between the U.S. Department of Agriculture Animal and Plant Health Inspection Service and the DoD, DoD WPM Program, dated 16 Nov 05.

___ 7 CFR (Agriculture), Chapter III, Part 319.40-3 (Foreign Quarantine Notices), [Docket No. 02-032-3], Federal Register Volume 69, Number 179, pages 55719-55733, dated September 16, 2004.

YES___/ NO___

Comments: _____

Overall WPM References Evaluation-~~GO~~___/NO GO___

DOD WPM "Pest Free" and IPPC Certification Marking Devices Control

Does site use DoD "Pest Free" or DoD IPPC certification marking device(s)? YES___/ NO___

Who is responsible for securing, handling, and use of the certification marking device(s)?

Name(s): _____

Title: _____

Does site use a stencil to mark WPM products used in shipping? YES___/ NO___

Site has procedures for who can stencil marks (e.g., have training)? YES___/ NO___

WPM Site Custodian performs monthly checks for legibility and clarity of certification markings? YES___/ NO___

Does the supervisor/manager document when audits done? YES___/ NO___

Comments: _____

Overall WPM Mark and Stamp Control Evaluation-~~GO~~___/NO GO___

Appendix A
Army WPM Self-Certification Site Auditor's Checklist

DOD WPM Discrepancy Controls

Does the WPM Focal Point:

Receive a copy of all WPM SDRs? YES___/ NO___

Prepare remedial plan of action to remedy discrepant shipment? YES___/ NO___

Investigate cause of discrepancy? YES___/ NO___

Prepare resolution plan of action to ensure cause of discrepancy is removed from process? YES___/ NO___

Execute both plans of action and document results? YES___/ NO___

Comments: _____

Overall WPM Discrepancy Controls Evaluation-GO___/NO GO___

WPM Forms

Site has log book(s) containing the forms for:

receipt lumber inspection/verification? YES___/ NO___

fabrication/dunnage/repairs work order or record? YES___/ NO___

monthly board footage usage? YES___/ NO___

existing stock inspection/markings (DoD "Pest Free") ? YES___/ NO___

site WPM monthly reports? YES___/ NO___

Can maintainer of log book(s) explain how monthly board footage usage is determined or checked? (Review how numbers were determined for previous months data (receive, fabricate, store, and ship).) YES___/ NO___

Is there a management file/notebook that contains SDRs, WPM audits, or other reports written against the site for inadequate or improper WPM construction or marking? YES___/ NO___

Are corrective action responses and action plans attached to each discrepant report? YES___/ NO___

Have they been implemented? YES___/ NO___

Comments: _____

Overall WPM Forms Evaluation-GO___/NO GO___

Appendix A
Army WPM Self-Certification Site Auditor's Checklist

Site WPM Standard Operating Procedures (SOP)

Does site have WPM SOP for new receipts – new procurement, field returns (audits/inspections)? YES___/ NO___

If no, did you provide WPM basic receiving SOP? YES___/ NO___

Does site have WPM SOPs for stock in storage – inspections and marking? YES___/ NO___

If no, did you provide WPM basic storage SOP? YES___/ NO___

Does site have WPM SOPs for repacks - stock remediation? YES___/ NO___

If no, did you provide WPM basic repacking SOP? YES___/ NO___

Does site have WPM SOPs for shipping - WPM mark audit procedures? YES___/ NO___

If no, did you provide WPM basic shipping SOP? YES___/ NO___

Does site have WPM SOP for audits? YES___/ NO___

If no, did you provide WPM basic audit SOP? YES___/ NO___

Comments: _____

Overall WPM SOP Evaluation-GO ___/NO GO ___

WPM Acquisition and Storage

Are all local purchases of lumber heat-treated to ISPM-15 requirements? YES___/ NO___

If no, do the local acquisition personnel ensure that the “HT” lumber is annotated for box shop use? YES___/ NO___

Is lumber segregated in storage based on “HT” status? YES___/ NO___

Is the inventory controlled during storage? YES___/ NO___

Does warehouse worker select lumber IAW first-in, first-out procedures? YES___/ NO___

Overall WPM Acquisition and Storage Evaluation-GO ___/NO GO ___

Appendix A
Army WPM Self-Certification Site Auditor's Checklist

On-Site Physical/Visual Inspections

In receiving, do the installation CRP personnel:

Inspect incoming WPM for compliance? YES___/NO___

Segregate compliant and noncompliant WPM? YES___/NO___

Prepare a report of discrepancy on noncompliant WPM? YES___/NO___

Inspect raw lumber receipts for heat treated (HT) or methyl bromide (MB) markings?
YES___/NO___

Provide a copy of the receiving document to the WPM Site Custodian? YES___/NO___

In the wood shop, do the personnel there:

Keep HT lumber separated by at least 4-feet from non-treated lumber? YES___/NO___

Have on hand inventory of all raw lumber? YES___/NO___

Maintain inventory control during staging prior to use? YES___/NO___

Select and cut "HT" lumber and properly annotate wood used? YES___/NO___

Fabricate WPM products and mark with DoD IPPC certification? YES___/NO___

Annotate work order that DoD IPPC certification marking was used? YES___/NO___

Does the shop foreman check and sign work order? YES___/NO___

Is the work order sent to WPM Site Custodian? YES___/NO___

What are some of the HT lumber mill markings: _____

How far apart on lumber:

Are regular and WPM products (pallets, boxes, crates, skids, and container dunnage) made or assembled in one or more locations on the installation (e.g., Supply and Maintenance)? YES___/NO___

Where: _____

Appendix A
Army WPM Self-Certification Site Auditor's Checklist

Obtain names of persons fabricating, repairing, assembling WPM products in the various areas. Compare names with site listing of those who are noted as WPM trained. Any discrepancies noted? YES___/ NO___

Who: _____

Is there a moisture meter available to audit wpm products in stock with date pack markings less than 5 years? (Have one of the certified WPM packers/assemblers demonstrate how used and moisture recordings collected.) YES___/ NO___

Inspect WPM wooden boxes fabricated by site personnel or local contracted out fabrication. Are WPM markings visible and readable? YES___/ NO___

ALSC, NWPCA, DoD markings--

Where are markings located on pallets? _____

Where are markings located on boxes? _____

Where are markings located on skids or crates? _____

Comments: _____

In the Packing and Preparation for Shipment Areas-

Packer packs box using blocking, bracing, or cushioning; nails box closed; and places WPM compliance (DoD IPPC certification) markings on box and dunnage if not already marked? YES___/ NO___

Do the packers understand and follow WPM procedures? YES___/ NO___

Packer prepares packaged item for delivery (bands, applies address and special handling labels, etc.)? YES___/ NO___

Forklift truck operator loads finished package into shipping container, truck, ship, or rail car? YES___/ NO___

Overall WPM On-Site Physical/Visual Inspections Evaluation-GO___/NO GO___

Other items of interest WPM Site Auditor observed during visit.

Appendix B

Definition/Description of Terms

1. Animal and Plant Health Inspection Service (APHIS). A U.S. Department of Agriculture (USDA) activity that is assigned the responsibility of protecting American agriculture. APHIS provides leadership in ensuring the health and care of plants and animals. Safeguards agriculture and natural resources from the risks associated with the entry, establishment, or spread of animal and plant pests.
2. American Lumber Standard Committee (ALSC). The ALSC, comprised of manufacturers, distributors, users, and consumers of lumber, serves as the standing committee for the American Softwood Lumber Standard for the grade marking of lumber produced under the system, to include heat treatment (HT). The ALSC also administers accreditation programs for the quality marking of treated lumber produced under standards written and maintained by the American Wood Preserver's Association and for the labeling of wood packaging material produced under their standards.
3. Bark-free Wood. Wood from which all bark excluding the vascular cambium, ingrown bark around knots, and bark packets between rings of annual growth has been removed.
4. Dunnage. WPM used to secure or support a commodity but which does not remain associated with the commodity.
5. International Plant Protection Convention (IPPC). An international treaty relating to plant health, to which 138 governments, including the U.S.A. (as of 25 April 2005) currently adhere. Its main purpose is to secure action to prevent the spread and introduction of pest of plants and plant products, and to promote appropriate measures for their control.
6. National Wooden Pallet and Container Association (NWPCA). An international trade association representing manufacturers, recyclers and distributors of wood pallets, containers and reels.
7. Phytosanitary. Matters related to plant health, which include the protection of natural flora and plant products, such as soft and hardwood trees. It also includes both direct and indirect damage by pests.
8. Processed wood material. Products that are a composite of wood constructed using glue, heat and pressure, or any combination there of. Examples include plywood, particleboard, oriented strand board (OSB), veneer and wood wool, etc.
9. Wood Packaging Material (WPM). Non-Coniferous (hardwood) and Coniferous (softwood) packaging material used in supporting, protecting, or carrying a commodity (includes dunnage). Examples of WPM include but are not limited to pallets, skids, pallet collars, containers, crates, boxes, cases, bins, reels, drums, load boards, and dunnage. Wood packaging made of exempt materials but combined wit solid wood components must still be treated and marked. Does not include processed wood materials

Appendix B

Definition/Description of Terms

and manufactured wood products. (WPM was previously known as Non-Manufactured Wood Packaging Materials (NMWPM) or Solid Wood Packaging Material (SWPM).

10. WPM Site Auditor. A trained, independent, and impartial examiner assigned in writing.
11. WPM Site Custodian. Government/contractor employee responsible for maintaining WPM Program documents and records; for completing monthly, the DoD WPM Internet Website Data; and controlling the access and use of the marking devices. The installation commander, logistics director, or highest ranking person on the facility appoints in writing the WPM Site Custodian
12. WPM Compliance. Satisfying the intent and provisions of the UN International Plant Protection Commission guidelines of March 2002, as implemented by the United States CFR 2004, U.S. allies, and other friendly governments.

Appendix C

Glossary of Acronyms

ALSC	American Lumber Standards Committee
AMC	U.S. Army Materiel Command
APHIS	Animal and Plant Health Inspection Service
CBP	Customs and Border Protection (or Patrol)
CCP	Container Consolidation Point
CONUS	Continental United States
DLA	Defense Logistics Agency
DoD	Department of Defense
DoDAAC	Defense Activity Address Code
DUN	Dunnage
EC	European Communities
EU	European Union
HQDA	Headquarters, Department of the Army
HT	Heat-Treatment
ICPTARP	U.S. Navy Inventory Control Point Technical Assistance for Repairables Protection (a Depot Level Repairable Packaging Return Program)
IPPC	International Plant Protection Convention
ISPM	International Standards for Phytosanitary Measures
LOGSA	Logistics Support Activity
MACOM	U.S. Army Major Command
MB	Methyl Bromide
MOA	Memorandum of Agreement
NAVICP	Navy Inventory Control Point
NPPO	National Plant Protection Office (Host Nation's USDA APHIS)
NSN	National Stock Number
OCONUS	Outside Continental United States
POC	Point of Contact
PSCC	Packaging, Storage, and Containerization Center
PWN	Pinewood Nematode (microscopic bugger who stated this mess)
QA	Quality Assurance
SDR	Supply Discrepancy Report (old ROD)
SOP	Standard Operating Procedures
UN	United Nations
USDA	United States Department of Agriculture
WPM	Wood Packaging Material (old Solid Wood Packing Material)