

Rec'd 2/11/14 DRS  
From Ed Murenburg



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February 11, 2014

Mr. Brian Gale, Chairman  
Board of Building Regulations and Standards  
One Ashburton Place  
Boston, MA 02108

**RE: 780 CMR Public Hearing**

Dear Chairman Gale,

As a Master Sheet Metal Worker, license # 3853, and Sheet Metal Contractor, license # 133, licensed under sheet metal regulations 271 CMR, I submit the following comments on the proposed 780 CMR revisions.

**Chapter 1.0**

**Current language:**

101.4. 11 Duct Work and Sheet Metal. See the Board of Examiners of Sheet Metal Workers regulations at 271 CMR.

**New proposed language:**

101.4.11 Duct and Sheet Metal. Any reference in this code to duct and sheet metal may be considered reference to 271 CMR: Board of Examiners of Sheet Metal Workers. 271 CMR is enforced by the building official.

Per M.G.L. c. 112 and 271CMR local inspections are “enforced by the local inspector of buildings or a like official” and for Commonwealth Inspections “The Board and designated DPL staff shall grant or deny such permit applications and DPL inspectors shall perform the related inspections.”

***This new language clearly conflicts with sheet metal laws and regulations regarding Commonwealth Inspections.***

**Chapter 9.0**

**New proposed language:**

909.21.3 Testing. Operational testing of the smoke control system shall include all equipment such as initiating devices, fans, dampers, controls, doors and windows.

***This new language clearly conflicts with sheet metal laws and regulations regarding the testing of ductwork and air-handling equipment. The design, installation, testing or repair of ductwork, fans, dampers, grilles, screens and louvers associated with smoke exhaust or stairway pressurization systems is clearly “sheet metal work” per M.G.L. c. 112 and 271 CMR.***

Sincerely,

Paul G. Hardiman, Jr.

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