



COCHRANE VENTILATION INC.

June 3, 2015

Mr. Peter Kelly
Associate Executive Director
Board of Sheet Metal Workers
Commonwealth of Massachusetts

Dear Mr. Kelly:

Cochrane Ventilation Inc. performs cleaning of ventilation systems throughout Massachusetts and at times is required to install access doors into the ductwork for cleaning purposes. This is particularly true with kitchen exhaust systems. The actual installation of clean out doors is a very small portion of our services but a vital component, and, in most cases, is performed off hours.

The number of hours expended annually installing duct access for the entire company in any given year is less than 500 hours. When the state mandated the requirement of a sheet metal license to install access, a number of our employees were qualified to be grandfathered. But given that our company spends so few hours per year actually installing access, an Apprentice will not accumulate enough field hours to meet the requirements set forth by the State.

The license also requires attending classes which are held evenings and directly conflicts with scheduling our crews on the second and third shifts, and would require them to attend class rather than work two days a week.

Currently under the State of Massachusetts and City of Boston regulations, our employees are required to be licensed for cleaning kitchen exhaust systems, and as part of obtaining that license must pass an exam to demonstrate their knowledge of NFPA Standard 96 and the related code requirements. This license requires specific knowledge on the installation of clean out doors in kitchen exhaust systems and the related specific code requirements.

It is only a matter of time before our Grandfathered license holders retire and our company will no longer have the means of assisting our employees in acquiring sheet metal licenses in the future.

Understanding that installation of clean out doors has historically been a component of our trade and that both the City of Boston and State of Massachusetts mandate and test our knowledge to specific code requirements for the installation of clean out doors, I respectfully request of the Board to consider a means for those in our industry to reasonably obtain a sheet metal license even if it is a lesser license that is restricted to the installation of clean out doors and minor repairs.

Thank you for your time and consideration.

Sincerely,

Charles W. Cochrane
President