

July 23, 2015

The Board of Examiners of Sheet Metal Workers
1000 Washington Street, Suite 710
Boston, MA 02118

Attention: Board Members

Reference: 271 CMR Review

I'd like the Board to continue the effort to develop their own specialty code for all sheet metal work including duct work, metal roofing, louvers, etc. I believe a separate code will help improve the understanding of what "sheet metal work" is and what work actually requires a sheet metal license and permit. The conflicts that exist between the Sheet Metal Board and the Board of Building Regulations and Standards (BBRS) are more about jurisdiction of work than conflicts over code issues. These jurisdictional conflicts will not go away by simply continuing to use the International Mechanical Code. To really clear up confusion, this Board needs to complete the development of their own specialty code and the BBRS needs to remove all references to sheet metal work from all their codes or amend them so that all references to sheet metal work cite 271 CMR.

This Board was created to regulate sheet metal work but for some reason the BBRS seems to think they still have jurisdiction over certain types of sheet metal work - residential installations, residential duct testing, metal roofing installations, louvers, etc. This is what is really causing all the confusion on job sites. After reviewing the statute that created the BBRS, I see no reference to mechanical or sheet metal work and I question whether they ever had any statutory authority over sheet metal work or mechanical systems.

M.G.L. Chapter 143, Section 94. The board (BBRS) shall have the following powers and duties:

(a) To formulate, propose, adopt and amend rules and regulations relating to (i) the construction, reconstruction, alteration, repair, demolition, removal, inspection, issuance and revocation of permits or licenses, installation of equipment, classification and definition of any building or structure and use or occupancy of all buildings and structures and parts thereof or classes of buildings and structures and parts thereof, except bridges and appurtenant supporting structures which have been or are to be constructed by or are under the custody and control of the department of highways, the Massachusetts Bay transportation Authority, the Metropolitan District Commission or the Massachusetts Port Authority or for which said agencies have maintenance responsibility; (ii) the rehabilitation and maintenance of existing buildings; (iii) the standards or requirements for materials to be used in connection therewith, including but not limited to provisions for safety, ingress and egress, energy conservation, and sanitary conditions; (iv) the establishment of reasonable fees for inspections, which fees shall be collected and retained by the city or town conducting such inspections.

Sincerely,



Michael Sheehan
Sheet Metal Worker's
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