



STATE OF WASHINGTON
DEPARTMENT OF LABOR AND INDUSTRIES

Prevailing Wage
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November 1, 2007

Eric Martinson
Sheet Metal Workers Local 66
13513 NE 126th Pl., Suite A-1
Kirkland, WA 98034-8725

Re: Metal Fabricators (in-shop) Scope of Work does not include sheet metal work

Dear Mr. Martinson:

This letter is in response to your email requesting a determination regarding in-shop Metal Fabricators ([WAC 296-127-01352](#)). Your concern was a misclassification of sheet metal work as metal fabrication work. The answer below is based on the information you provided. References to the Revised Code of Washington (RCW) and the Washington Administrative Code (WAC) are included. Again, this answer is based on your fact set. If the facts differ from those you provided, the answers may be different.

The prevailing wage rates are identified by trade and occupation names. The state prevailing wage law, [RCW 39.12](#), does not require that any particular work be performed by a particular craft. It does require, however, that when prevailing wage rates have been determined for a particular type of work, workers performing such work on public projects must be paid not less than the prevailing rate for the scope of work actually performed.

There are a number of parameters that define the scope of work for in-shop Metal Fabricators. This trade and occupation classification is only for work in established fabrication shops, not for any on-site work, and not for temporary facilities. In-shop Metal Fabrication rates are established by surveying established shops. Hours worked in the field or on-site are incorrect and will not be used for the in-shop Metal Fabrication survey, nor can the in-shop rate be used for any work in the field.

Note that the work of the in-shop Metal Fabricator ([WAC 296-127-01352](#)) does not include in-shop work that is properly classified as the work of another trade and occupation classification.

For instance, Boilermakers ([WAC 296-127-01305](#)) assemble, erect, repair, and clean boilers, tanks, vats, and pressure vessels. In-shop Metal Fabricators ([WAC 296-127-01352](#)) do not perform that work of the Boilermaker.

Typically, sheet metal work is light gauge metal. Using the Sheet Metal Workers Scope of Work ([WAC 296-127-01372](#)) as another example to be distinguished from in-shop Metal Fabrication, the Sheet Metal Workers perform the handling, conditioning, assembling, installing, servicing, repairing, altering and dismantling of HVAC duct work as well as cornices, gutters and downspouts, and other architectural sheet metal. The Sheet Metal Workers also install metal roof decking, metal siding, metal roofing, and sheet metal work in connection to commercial kitchen equipment or refrigerating plants. The Sheet Metal Worker may perform work in-shop or on-site. The in-shop Metal Fabricator ([WAC 296-127-01352](#)) does not do architectural sheet metal or HVAC duct work, and does not do the Sheet Metal Work described within the scope of work for the Sheet Metal Worker. Certainly, the in-shop Metal Fabricator never performs work outside of an established shop facility.

There is an important limit for a very specific exception to the Sheet Metal Workers Scope of Work: Only the Ironworker rates are appropriate for the work on packaged pre-engineered metal buildings. Since all the components are part of the engineered structure's integrity, siding and roofing on these structures is done by Ironworkers, not by Carpenters or Sheet Metal Workers, and not by Roofers.

The in-shop Metal Fabricators ([WAC 296-127-01352](#)), for the purpose of the Washington State Public Works Law Chapter 39.12 RCW, fabricate and assemble structural or ornamental metal products, such as frame work or shells for machinery, tanks, stacks, and metal parts for buildings and bridges. The work includes, but is not limited to: Develop layout and plan sequences of operation. Design and construct templates and fixtures. Locate and mark bending and cutting lines onto workpiece. Operate a variety of machines and equipment to fabricate metal products, such as brakes, saws rolls, shears, flame cutters, drill presses, bending machines, welding machines, and punch and forming presses. Set up and operate machine tools associated with fabricating shops, such as radial drill presses, end mills and edge planers, to turn, drill and mill metal to specific dimensions. Weld, forge weld, braze, solder, rivet or bolt components together to assemble workpiece.

Note that the work described for the in-shop Metal Fabricator ([WAC 296-127-01352](#)) is limited to parts for buildings and bridges. This separates the in-shop Metal Fabrication Scope of Work from other work that might be for boat or shipbuilding and repair, aerospace products and applications, as well as the vast majority of precision machine work and manufacturing.

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There is considerable overlap between the in-shop Metal Fabricators Scope of Work ([WAC 296-127-01352](#)) and that of the Ironworkers ([WAC 296-127-01339](#)). A crucial distinction is where the work can be performed. The Metal Fabricator is only in-shop. The Ironworker does not have that limitation.

Metal Fabricators ([WAC 296-127-01352](#)) perform work in-shop only. That in-shop work of the Metal Fabricators does NOT include architectural sheet metal nor does it include HVAC duct work.

Washington State prevailing wage information, including the WACs, are available on the department's web site: <http://www.lni.wa.gov/TradesLicensing/PrevWage/default.asp>

I hope this addresses your question and clarifies the distinction of tasks performed by the in-shop Metal Fabricators from the work of the Sheet Metal Workers. If you need additional information or have questions, please contact me at 360-902-5330 or somd235@lni.wa.gov.

Sincerely,

David J. Soma
Industrial Statistician
Prevailing Wage Program Manager