

**PREVAILING WAGE PROGRAM – (360) 902-5330  
SPECIALTY COMPLIANCE SERVICES DIVISION  
P.O. BOX 44540, OLYMPIA, WA 98504-4540**

May 8, 2006

Mr. Rich Cotner  
Pre-Fab Installations, Inc.  
1315 North Meridian Road  
Meridian, Idaho 83642

Re: What Trade or Trades Erect the Pre-Engineered Metal Building System you erected at the Washington State Light Industrial Park (WSLIP).

Dear Mr. Costner:

This letter is in response to your request for a determination of the appropriate scope of work classification relating to the erection of pre-engineered metal building systems that are not packaged pre-engineered metal buildings.

Unlike normal structures, a packaged pre-engineered metal building is a sophisticated structure. All structural members work together to support each other. The building system consists of integrated sets of mutually dependant components and assemblies that form a building. These include: primary and secondary structural framing, roof panels, wall panels, soffit panels and accessories. This monocoque method of construction and assembly in which the outer skin of a structure carries a significant portion of the stresses of the structural body as well as the close dynamic relationship between all component parts, makes these structures unique.

In making a determination for the appropriate scope of work classification, the department looks to the Prevailing Wage Law (Chapter 39.12 RCW and Chapter 296-127 WAC). In making this determination, I reviewed the scope of work descriptions for Carpenters, WAC 296-127-01333, Ironworkers, WAC 296-127-01339, and Sheet Metal Workers, WAC 296-127-01372. Additionally, I spoke with a representative of the Ironworkers Local # 14.

In my review of the relevant scopes of work, the only clear reference to packaged or pre-engineered metal buildings appears in the Ironworkers scope of work. Although both the Carpenters and Sheet Metal Workers scopes of work make reference to metal roof decking and siding, the references are specifically to structures other than packaged pre-engineered metal buildings. The scope of work for Ironworkers clearly includes the erection of steel and metal houses, packaged, pre-engineered buildings; the scopes of work for Carpenters and Sheet Metal Workers just as clearly omit that work.

Rich Cotner  
April 24, 2006  
Page 2

Several factors support the use of a single trade including the close integration of the structural shapes, structural bracing, shaped siding, end panels and roof panels along with the specific fastening and bracing methods, and the described methods of simultaneous erection of the component parts to create a monocoque structure.

You submit that the pre-engineered metal building system you installed at the WSLIP differs from a packaged pre-engineered metal building in three ways: In the pre-engineered metal building system you installed at WSLIP, the main framing system is designed and engineered by one Pre-Engineered Metal Building (PEMB) company.

Also, the secondary wall sheeting and or roofing systems are designed and engineered by a separate company and the wall sheeting is attached to metal studs outside the secondary framing. Finally, the secondary wall sheeting, roofing and miscellaneous screws, nuts and bolts are supplied by another separate company. None of these apply to a packaged pre-engineered metal building. A non-packaged PEMB system has numerous engineers, designers, fabricators and suppliers from different manufacturers as opposed to one manufacturer that designs, engineers and fabricates a "packaged" building.

Therefore, in response to your question, as long as all three of the above facts are present, it is my determination that the erection of a non- packaged, pre-engineered metal building system, as described above, falls under the scope of work for Ironworkers, WAC 296-127-01339, Sheet Metal Workers, WAC 296-127-01372. and Carpenters, WAC 296-127-01333 depending on the work performed. As always, the structural steel framing is Ironworker work, and the sheet metal roofing belongs to the Sheet Metal Workers unless the roof sheets are attached directly to the purlins and then it is Iron worker work. Given different or conflicting facts, I may reach a different conclusion as to the non-packaged pre-engineered metal building system you erected at WSLIP.

I hope this letter serves to address your request. If you have any questions or need additional assistance please contact me at 360 902-5330.

Sincerely,

David J. Soma  
Industrial Statistician  
Prevailing Wage Program Manager  
Department of Labor and Industries

cc: Iron Workers Local No. 14  
Sheet Metal Workers Local Union No. 66  
Pacific Northwest Regional Council of Carpenters