



5727 Baker Way NW, #200
Gig Harbor, WA 98332
Phone: 206-338-7381
www.nucawa.org

Re: Scope of Work and Rate Applicable to Joining of HDPE Pipe

To Whom It May Concern:

We, as representative contractor members, write on behalf of the Washington Chapter of the National Utility Contractors Association ("NUCA"). NUCA Washington includes over 27 utility contractor members and over 48 associate members who are involved in the utility contracting industry here in Washington. NUCA provides training, assistance, and education to its members, and represents the industry in Olympia.

We are aware that the United Association of Plumbers and Pipefitters Local 32 has appealed the Determination issued by Industrial Statistician and Prevailing Wage Program Manager Jim Christensen on January 29, 2019, which concluded, in part, that pipe-joining on leachate and/or gas piping on landfill projects was appropriately paid at the Laborers prevailed rate of pay.

For decades, NUCA members have consistently used Laborers to construct and install HDPE piping systems for utilities, when those piping systems are *outside* a structure, and have treated that scope of work as that set forth in WAC 296-127-01344. This includes fusion of HDPE pipe using butt fusion technology. In contrast, when piping systems, including HDPE pipe, is constructed *inside* a structure, NUCA members would use Pipefitters and treat the scope of work as that set forth in WAC 296-127-01364.

This is reflected in the thousands of Statements of Intent and Final Affidavits of Wages Paid that the Department has consistently approved for over twenty years for this work, and which the Industrial Statistician must approve per RCW 39.12.040.

It is our firm belief that the laborers scope of work contained in WAC 296-127-01344 is the appropriate scope of work for all HDPE pipe fusion that occurs outside a building, and that this is reflected in a well-established and predominant industry practice.

Sincerely,

A handwritten signature in blue ink, appearing to read "Shane Webley".

Shane Webley
Board President, NUCA of Washington

Cc: Liz Truong, NUCA of Washington Executive Director