



New York City District Council of Carpenters Labor Technical College

395 Hudson Street, New York, NY 10014 | (212) 727-2224 phone (212) 727-9776 fax
www.nycdistrictcouncil.org

March 18, 2011

Mr. Jackson Hom
NYS Department of Labor
Office of Apprentice Training
75 Varick Street
New York, NY 10013

Dear Jackson,

It has come to our attention via the Hudson Valley Building and Construction Trades Council that the Plumbers have applied to the Department of Labor for approval of a Plumber (Pump and Tank) Apprentice Program. There are tasks within this program that are not within the jurisdiction of plumbers, nor do they require the establishment of a new apprentice program. Specifically:

- Excavation and trenching—using backhoe, shovels, transit and level
- Masonry work, including concrete forming and finishing
- Basic electricity and wiring
- Installation of electrical controls
- Tanks installations and removals
- Handling and disposing of hazardous materials during environmental remediation

RECEIVED

MAR 28 2011

APPRENTICE TRAINING
CENTRAL OFFICE

Please find attached the "Appendix A and B" for the Plumber (Pump and Tank) program.

Although the comment period has passed, we feel that the Department of Labor should take into consideration that we strongly oppose the approval of this program.

Much of the content of the program is already covered within the work processes and classroom training of other trades. The work described in these documents does not constitute a separate job classification necessitating an apprentice program.

We would appreciate if you would relay our concerns to the relevant parties in Albany who are overseeing the approval.

Sincerely,

Martin T. Daly
Director of Training

RECEIVED
NEW YORK CITY

MAR 22 2011

NYS DEPARTMENT OF LABOR
APPRENTICESHIP UNIT

Erickson, Mary (LABOR)

From: Martin Daly [REDACTED]
Sent: Wednesday, March 30, 2011 1:22 PM
To: Erickson, Mary (LABOR)
Subject: RE: Your Comments on "Plumber (Pump and Tank)"

Millwrights

From: Erickson, Mary (LABOR) [mailto:Mary.Erickson@labor.ny.gov]
Sent: Wednesday, March 30, 2011 1:14 PM
To: [REDACTED]
Cc: Reardon, Cathy (LABOR)
Subject: Your Comments on "Plumber (Pump and Tank)"

Good afternoon, Martin.

We have received your comments opposing approval of the new trade of "Plumber (Pump and Tank)". You have indicated that you believe that some of the tasks included in the draft outline are already covered by other apprenticeable trades. You listed six of these tasks. It would be very helpful if you could identify which other apprenticeable trades you believe these tasks belong to.

The direct link to our webpage announcement on this trade is:
<http://www.labor.state.ny.us/apprenticeship/general/PendingTrades.shtm>.

Instructions for how to submit additional comments by e-mail are right on the webpage. Please let me know if you have any technical difficulties.

Thank you.

Mary Erickson
Occupational Analyst'
(518) 457-1412

From: Martin Daly [REDACTED]
Sent: Wednesday, March 30, 2011 4:42 PM
To: Erickson, Mary (LABOR)
Subject: RE: Your Comments on "Plumber (Pump and Tank)"

Mary, Not millwrights, the trade of Dock Builder/carpenter.
Thanks for your help, Martin Daly

From: Martin Daly [REDACTED]
Sent: Monday, April 04, 2011 7:49 AM
To: Erickson, Mary (LABOR)
Subject: RE: Your Comments on "Plumber (Pump and Tank)"

Carpenter, dockbuilder, operating eng., bricklayer
