



PLUMBERS & STEAMFITTERS LOCAL 267

107 Twin Oaks Drive
Syracuse, New York 13206

701 West State Street
Ithaca, New York 14850

To whom it may concern,

This letter is in response to the recent application for a Plumber and Pipefitter apprenticeship submitted by Wilkins Mechanical. Plumbers & Steamfitters Local 267 and the Joint Apprentice and Training Committee strongly oppose such a program as applied for by Wilkins Mechanical.

Plumbers & Steamfitters Local 267 JATC currently sponsors two registered apprenticeship programs under the category of Plumber and Steamfitter. Though Wilkins Mechanical is applying for a Plumber and Pipefitter apprenticeship program, they are very similar in nature and should be held to similar minimum standards.

The submitted application for apprenticeship contains very little information about the related instruction requirements of the program. The following organizations are listed on the application as available Related Instruction followed by a brief description of how the offered instruction does not meet the requirements of a Plumber and Pipefitter apprenticeship program.

- **Construction Training Centers of NY:** The 116 hour course offered by CTCNYS is a course that is designed more for those that are looking to enter the construction industry as a Carpenter or Laborer. Early Plumber/Pipefitter/Steamfitter apprentices must learn basic safety and operation of tools and equipment as it pertains to the piping industry. Some tools and equipment used in the piping trades are unique to the task being accomplished. This program does not introduce the safe operation of the tools and equipment that apprentices will be required to use.
- **Penn Foster (online plumbing program):** This six month plumbing program offered online is based on the National Standard Plumbing Code. New York State uses the 2015 International Plumbing Code (IPC) as its model code. Apprentices taking this course would not be learning the proper installation as required by the Plumbing Code of New York State.

Municipalities throughout the state also have created legislation that govern the installation of plumbing systems. As an example, Onondaga County Local Law No. 9 "Rules and Regulations for Plumbing Installations." These regulations are not covered by an organization that is located in Scottsdale, Arizona.

The course material included in this program would align more with a Residential Plumber apprenticeship program.

- **In-house Training Provided by Wilkins Mechanical:** There is no curriculum or syllabus that indicates the objectives, topics of study, or hours of instruction supplied with the application to show what "in-house training" consists of. There is no indication of who the instructor(s) are or what their qualifications are.

The description of "in-house training" does not sufficiently describe how the remaining 3 ½ years of related instruction would be carried out.

United Association of Journeymen and Apprentices of the Plumbing
and Pipe Fitting Industry of the United States





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The application does not meet the minimum requirement of 144 hours per year of related instruction. As stated above, we would expect any apprentice program that Wilkins Mechanical were to sponsor be held to the same minimum standards of those sponsors that currently operate such a program. This application falls short of the standards that Plumbers & Steamfitters Local 267 JATC have operated at and what is required by the New York State Dept. of Labor.

Thank you for your time in regards to this matter.

Respectfully submitted,

[REDACTED]

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