## International Association of BRIDGE, STRUCTURAL, ORNAMENTAL AND REINFORCING IRONWORKERS LOCAL 29



11620 N.E. Ainsworth Circle, Suite 200 · Portland, Oregon 97220

(503) 774-0777

Fax (503) 775-0947

April 12, 2023

Jessica Ponaman Bureau of Labor and Industries 800 NE Oregon Street, Suite 1045 Portland, OR 97232

ATTN: Request for Revision to Occupational Definition for Ironworkers

Dear Ms. Ponaman,

I am writing to request an update to the Bureau of Labor and Industries' Definitions of Covered Occupations for Public Works Contracts in Oregon, specifically to the occupational definition for Ironworkers. We have found that as green energy technology has evolved, so has the energy infrastructure that Ironworkers build across the state of Oregon. To reflect the work that our members are currently doing and will continue to do in the future, we would like to formally request that our occupational definition be updated to now include both the construction of solar racking systems and the erection of wind turbines.

We propose that the Ironworker typical duties be expanded to include:

Jan D. Fussell

**Solar Racking:** Offloads, distributes, shoots elevational and installs, all racking components and tracker system, (pile caps, tube bearings, module brackets, torque tubes, center structure components, dampeners, drive motors, yokes, drivelines, all bolts, screws, and set screws for the installation thereof) in a photovoltaic solar array.

Wind Turbine Installation: Offloads, distributes, shoots elevations, and installs reinforcing steel in concrete pad, tower sections, all turbine components, nacelle, and builds and installs rotor.

Currently, Ironworkers from Local 29 have done more than 250,000 work hours in Oregon installing solar racking and many times that number installing wind turbines. Additionally, to ensure that the work is being done both correctly and safely, we have incorporated training to install solar racking and many times that number installing wind turbines, and acquired training mock ups for our apprentices to use while they go through their Registered Apprenticeship program. For these reasons, we believe that the requested revisions above to the Ironworker occupational definition are both appropriate and timely.

Thank you for your time and consideration,

Jason Fussell

FS-T/BM

Ironworkers Local 29