

**BEFORE THE
LABOR AND INDUSTRIAL RELATIONS COMMISSION
JEFFERSON CITY, MISSOURI**

LABOR AND INDUSTRIAL
RELATIONS COMMISSION

IN RE: Objection to Annual Wage Order No. 19, Issued on March 9, 2012, as it pertains to the Occupational Title of "Carpenter" for all counties within the State of Missouri; Objection No. 006-121

MOTION TO INTERVENE

COMES NOW, the International Association of Bridge, Structural, Ornamental and Reinforcing Iron Workers, Local Union No. #10. (hereafter "Iron Workers Local 10") and moves to intervene in the above-referenced Objection. In support of its Motion to Intervene, Iron Workers Local 10 avers as follows:

1. Iron Workers Local 10 is a labor organization whose offices are located at 1000 East 10th Street, Kansas City, Missouri, 64106.

2. Iron Workers Local 10 represents individuals who perform construction work in more than fifty (50) counties in the State of Missouri including: Andrew, Atchison, Barton, Bates, Benton, Buchanan, Caldwell, Carroll, Cass, Cedar, Chariton, Christian, Clay, Clinton, Cooper, Dade, Dallas, Daviess, Dekalb, Douglas, Gentry, Greene, Grundy, Harrison, Henry, Hickory, Holt, Howard, Jackson, Johnson, Lafayette, Linn, Livingston, Mercer, Moniteau, Morgan, Nodaway, Ozark, Pettis, Platte, Polk, Putnam, Randolph, Ray, St. Clair, Saline, Sullivan, Taney, Vernon, Webster and Worth.

3. The Carpenters' District Council of Greater Saint Louis and Vicinity has filed Objection No. 006-121 seeking to modify the existing work description for Occupational Title "Carpenter" under 8 C.S.R. § 30-3.

4. It is the position of Iron Workers Local 10 that a portion of the modifications requested within Objection No. 006-121 implicate and encroach upon work that is explicitly

contained within the Work Description for the Occupational Title “Iron Worker” and/or has been and continues to be performed by individuals working in the Occupational Title of Iron Worker within the State of Missouri.

5. A non-exclusive list of the reasons Iron Workers Local 10 seeks to intervene in this action include:

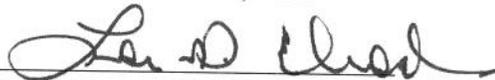
- a. Under the introductory paragraph (D), the current Work Description provides that carpenters construct, erect and install structures made of wood, plywood, wallboard and materials that take the place of wood. The modification provides that Carpenters would erect, install and repair structures of any type. The current Ironworker Work Description provides that Ironworkers “perform work in connection with ... installation, removal and dismantling of structural, architectural and reinforcing iron and steel...” The proposed modification clearly implicates work being performed by Ironworkers.
- b. Under Paragraph #1 of the Carpenter Work Description, the proposed modification would provide that Carpenters could perform the installation of any type of expansion joint, not only those made of aluminum. Ironworkers in Missouri traditionally perform the installation of expansion joints on bridges. Paragraph #10 of the Ironworkers Work Description includes the “erection, installation, removal, wrecking and dismantling of bridges...”
- c. The Objection proposes to add a new Paragraph #8 to the Carpenter Work Description. The addition would provide that Carpenters would perform the unloading and installation of all bleachers, platforms and walkways constructed of any type of material, including structural steel. Work involving structural steel has

always been the work of ironworkers. Paragraph #1 of the Ironworker Work Description identifies Ironworker duties to include “the unloading, erecting, bolting-up, plumbing-up, welding and installing of structural steel, including any field fabrication.”

- d. Iron Workers Local 10 disputes the proposed modification to Paragraph #9 of the Carpenter Work Description. The modification would add the language “[t]he unloading of all finished items installed by carpenters”. The language is overbroad by failing to provide specificity to what type of finished items are covered by the description. To the extent these items include the proposed additions to Carpenter work described above, the modification implicates existing Ironworker duties.
- e. The proposed modifications to the Carpenter Work Description implicate and encroach upon work historically and currently performed by Ironworkers. Since Iron Workers Local 10 represents Ironworkers in more than fifty (50) Missouri counties, Iron Workers Local #10 has a substantial interest in the outcome of the Commission’s consideration of this Objection.

WHEREFORE, for the foregoing reasons, Ironworkers Local #10 respectfully requests that the Missouri Labor and Industrial Relations Commission grant its Motion to Intervene.

Respectfully Submitted,
BLAKE AND UHLIG, P.A.

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CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of May, 2012, this Motion to Intervene was served on Lawrence P. Kaplan, Kaplan Associates, L.L.C., 101 South Hanley, Suite 1225, St. Louis, Missouri 63105, by U.S. Mail.

