

Letters

Time to Get Out?

I just got a notification from OSHA that when we did our last roof replacement, they didn't like that my ladder was only 2 feet above the roofline, not the required 3 feet. They also did not like my climbing rope safety line; they wanted a different harness, even though we were all tied off and anchored. They somehow thought that we do not have a safety program, even though my crew had reviewed the safety aspects of the job at my office, watched a video on roof safety, discussed how to do the job carefully and safely, and separated the work area with safety tape. Except for the OSHA fine, the job went very well — and safely. I've been licensed since 1974 and the only injury claim I've ever filed was a cut on the back of a thumb. Yet the fine for my reckless behavior is \$7,200.

Every time an inspector comes on a job site, I can assure you he can and will find some violation. I have taken the lead course and had my firm listed. But there is no way that a company is going to be able to fill out all the required paperwork, in the proper fashion, according to the required schedule, complete with all forms, reports, and notes — in addition to actually doing the job by the lead-safe rules.

I think our government, with its \$37,500 fines for RRP violations, is trying to tell us something, and I for one am hearing it. It's time to get out of this work. Anyone who thinks they can make a living as a licensed company had better start planning for some significant fines. The fact that you run a safe job site and care about your employees is just not part of the equation. And you'll always be bidding against a person in a truck who will be living in another town next month.

I've watched these regulations develop over time and I know there are good intentions. Regulators cite that accidents are down by 30 percent. This doesn't surprise me, as my business is down by 65 percent and I have laid off six guys. It hurts that I am not able to provide health coverage for my remaining six employees, and with this fine, it's time for me to leave the field. This puts six more people with families and mortgages out of work. But it is just not worth losing the rest of my life savings trying to maintain a remodeling business.

Bill Millard
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Ice Dam Follow-Up

As a professional home inspector for the past 41 years and a member of the American Society of Home Inspectors Technical Committee, I would like to comment on "Making a Business of Ice Dams" (1/11). While I agree with much of what is said in the article, I take issue with the following statements.

Regarding "ice shield" products, the author states that "not only is every nail hole a potential leak, but ice is strong enough to work its way under the laps in the membrane." These membranes are self-sealing and if installed properly will not leak around the nails. In regard to ice working its way up under laps, anyone who has worked with this material knows that if it does not go down properly the first time, it is virtually impossible to remove without tearing the material. Further, what is under the shingles is typically water, not ice.

He also states that "gutters do not cause or even increase the severity of ice dams." While I agree that ice dams can form even where there are no gutters, they definitely contribute to the problem by forming a collection area for snow and ice. In northern New York state, it is common practice to eliminate gutters and replace the bottom 4 feet or so of shingles with metal roofing. This allows snow and ice to slide off, thus minimizing ice damming.

Finally, I disagree with the statements regarding heat cables: They are effective, not "a last resort" if properly installed. The cables should lap into the gutters and run down through the downspouts to provide a path for the melting ice. The shortcomings of the cables are that they are expensive to operate and lose effectiveness at temperatures below 20°F.

Victor J. Faggella
Mahopac, N.Y.

Correction

In the fall-protection story in our March issue (*JLC Report*), Jeremy Bethancourt was incorrectly described as a member of OSHA's Advisory Committee on Construction Safety and Health (ACCSH). In fact, although Mr. Bethancourt has participated over the years in several ACCSH work groups and presented information to the committee as a member of the public, he is not a member of that committee.