

DEPARTMENT OF INDUSTRIAL RELATIONS
DIVISION OF OCCUPATIONAL SAFETY AND HEALTH
Research and Standards Occupational Safety Unit
1515 Clay Street, 19th Floor
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Debra Lee, Chief

January 20, 2026

Christopher Michael Pomey
Chief Manager
VariCap, LLC.
3056 Butternut Drive
Medina, MN 55340

Re: **APPROVAL:** VariCap Model # VC-0011
Title 8, Sections 1712 & 344.90

Dear Mr. Pomey,

This letter is in response to the successful test of your product conducted on July 18, 2025 at Twining Consulting, INC., 18071 Mount Washington Street, Unit A, Fountain Valley, CA 92708. The subject rebar protective covers were tested using the method described in Title 8 California Code of Regulations, Sections 344.90 & 1712 of the Construction Safety Orders. Senior Safety Engineer Amit Gupta, reviewed and witnessed this test and has reported that your product successfully passed the test of dropping a 250-pound bag of sand from a height of 10 feet without penetration of the bag. The VariCap Model # VC-0011 protective cover is designed to fit on rebar sizes # 4 to # 11. The VariCap Model # VC-0011 protective cover is hereby granted Division Approval Number **C-1751-AG**.

Based on this observation and the results of the test, the VariCap Model # VC-0011 protective cover is approved for use as impalement protection for the above-mentioned rebar sizes at grade or above grade when used in accordance with the manufacturer's instructions. Approval for use at grade means that employees are working at the same level as the projections being guarded by the protective covers. Approval for use above grade means that the protective covers are approved as impalement protection for a fall distance up to 7 1/2 feet above grade.

NOTE: The Division does not approve manufactured protective covers for fall distances in excess of 7 1/2 feet.

The Manufacturer's Instructions for use shall include, as a minimum, the following:

1. Instructions as to whether the protective cover is designed for use at grade or above grade.
2. A statement indicating the maximum height of fall that the cover is designed to protect against impalement, but not to exceed 7 1/2 feet.
3. Installation instructions.

4. Instructions regarding the inspection and or use of damaged or defective protective covers. The effects, if any, of damaged stabilizer vanes/fins shall be included in this instruction.
5. Any other instructions deemed necessary by the manufacturer regarding the use of the protective covers.

Protective covers or troughs that are approved by the Division shall be identified with permanent markings as follows:

1. Model Number or Trademark
2. Division Approval Number
3. Size(s) designation

Please submit a finalized instruction sheet and several samples of the completed product, addressed to the Division's Santa Ana office located at 2 MacArthur Place, Suite 700, Santa Ana, CA 92707. If you have questions regarding these conditions or other matters related to this approval you may contact me at (714) 567-7142.

Sincerely,



Jason Denning
Principal Safety Engineer

EB/AG/AR

cc: Senior Safety Staff
File: 1712