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ATOMIZER MULTI-OIL FUELED HEATERS, INSPECTION AND CERTIFICATION
CRITERIA FOR

OFFICE OF SOLID WASTE AND EMERGENCY RESPONSE

SEP 22 1988

Kathleen M. Blair, Director
Consumer Information Center
2402 Daniels Street
Madison, Wisconsin 53704

Dear Ms. Blair:

Thank you for your August 23, 1988, letter inviting the Environmental Protection Agency (EPA) to review "Specification No. PFS-983 Test, Inspection and Certification Criteria for Atomizer Multi-Oil Fueled Heaters."

In 1985, EPA issued a final rule that established a specification for used oil fuel. Used oil that meets this fuel specification can be burned for energy recovery without EPA restrictions, in any device. This rule restricted the burning of "off-spec" used oil fuel to certain devices (see 40 CFR §266.41(b)). One of these devices is a space heater (1) that burns only used oil that the owner or operator generates or used oil received from do-it-yourself oil changers who generate used oil as household waste; (2) that is designed to have a maximum capacity of 0.5 million BTUs per hour; and (3) that vents combustion gases to the outdoor air.

Although EPA has not developed more specific standards for space heaters, we are concerned about the risks posed by improperly maintained or operated space heaters (and other devices burning off-spec used oil fuel). We also recognize that certain types of space heaters may pose greater risks than others. This final rule was intended to address the greatest risks posed by uncontrolled burning of used oil fuel.

We plan to develop technical standards for burners of off-spec used oil fuel sometime in the future. At that time, we will further evaluate regulatory options to address risks posed

by space heaters. When we do propose a rulemaking on this subject, it will appear in the Federal Register and will allow for public comment.

With regard to your suggested technical specifications for used oil-fired, automation type, space heaters, we prefer not to comment on the document for two reasons: (1) we do not have the resources to comment on documents prepared by independent firms, and (2) we do not wish to imply any endorsement of one type of space heater (i.e., atomization type) over another.

If you have any questions, or would like to discuss the used oil regulations in more detail, please contact David Tomten of my staff at (202) 382-2550.

Sincerely,

Original Document signed

J. Winston Porter
Assistant Administrator