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Experience Quality the McCrea Way!

**McCREA EQUIPMENT COMPANY, INC. Est. 1936**

HEATING AND AIR CONDITIONING CONTRACTORS

4463 BEECH ROAD, TEMPLE HILLS, MD 20748

To: Brook Farber (West Virginia Licensing Board)**Title Series: 42-34****Rule name: Regulation of Heating, Ventilating, and Cooling Work**

McCrea Equipment Company along with every other large HVAC company working in the tri-state area utilizes specialty sheet metal contractors to help perform duct work installations in new homes. These contractors specialize in and only install ductwork; they follow our designs or designs from a third-party engineer and all the work they complete still falls under purview. Our foreman work with these companies and ensure the work they provide followed the plans and is correct and we warranty the work they complete. West Virginia requires these sheet metal only contractors to carry a license and hold a technician license, making it impossible for us and these companies to work in the state. With the proposed changes we would like to see the requirements changed to sheet metal subcontractors needing only to carry the new HVAC Duct technician license. It is very difficult for them to pass the business law portion for a contractor's license. We would request that Sheetmetal subcontractors performing part of the HVAC companies contracted work could work under the HVAC companies license while onsite if they have the new HVAC duct technician license.

Shane Lanhardt

A handwritten signature in black ink, appearing to read 'Shane Lanhardt'.

President**McCrea Equipment Company Inc.**

WEST VIRGINIA DIVISION OF LABOR

1900 Kanawha Boulevard East - State Capitol Complex - Building 3, Room 200 - Charleston, WV 25305



July 30, 2026

Shane Lanhardt, President
McCrea Equipment Company, Inc.
4463 Beech Road
Temple Hills, MD 20748

Shane.Lanhardt@McCreaway.com

Mr. Lanhardt:

Thank you for your submission of comments on the Division of Labor's (the "Division") proposed changes to 42 CSR 34, "*Regulation of Heating, Ventilating, and Cooling Work*." The Division appreciates your time in reviewing and commenting on the proposed changes, which are addressed below.

It is not within the Division's statutory authority or jurisdiction to exempt from contractor licensing requirements individuals who hold an HVAC duct technician license; such exemptions would be within the purview of the West Virginia Contractor Licensing Board (the "Board.") You may bring this matter to the attention of the Board for its consideration during the Board's September 24, 2026 meeting.

Sincerely,

A handwritten signature in blue ink that reads "Mitchell E. Woodrum".

Mitchell E. Woodrum, Commissioner

cc: DCasto@CampbellCastoClark.com