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<b>President</b> Peter Gallagher Pocono BA	<b>Vice President</b> Jim Brown Blair-Bedford BA	<b>Associate Vice President</b> Mark Stanley BIA of Lancaster Co.	<b>Treasurer</b> Dick Clawson Indiana-Armstrong BA	<b>Secretary</b> Andrew Kaye HBA of Bucks/Montgomery	<b>Immediate Past President</b> Kevin Coutts Wayne County BA
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May 12, 2015

Honorable Robert Godshall, Chair  
House Consumer Affairs Committee  
150 Main Capitol Building  
PO Box 202053  
Harrisburg, PA 17120-2053

RE: House Bill 48 – Water Well Construction Standards

On behalf of the Pennsylvania Builders Association (PBA), thank you for the opportunity to provide comments on House Bill 48 (Water Well Construction Standards.) PBA understands the goals of House Bill 48 and its predecessor (House Bill 343) from the previous legislative session. Housing industry professionals routinely design, build and use practices that protect Pennsylvania's environmental quality before, during and after construction, and certainly ensuring the safety of drinking water from residential wells is one of the most important.

Pennsylvania well drillers are currently licensed under the Department of Conservation and Natural Resources (DCNR) and must follow guidelines established by DCNR and the Department of Environmental Protection (DEP) that are commonly used in the industry.

As stated in our previous testimony before the House Environmental Resources and Energy Committee on House Bill 343, water wells are regulated under the Uniform Construction Code (UCC), the International Residential Code (IRC), and the International Plumbing Code (IPC). PBA believes that the language found in the UCC, IRC and IPC is a reasonable basis to define the relevant standards for safe drinking water and well construction.

PBA is pleased to see House Bill 48 include the requirement that regulations from the Environmental Quality Board (EQB) be developed from existing respected sources in this field, specifically the National Groundwater Association (NGWA)/American National Standards Institute (ANSI) construction and decommissioning standards. However, we are concerned with Section 3304 (a) of House Bill 48 allowing the EQB the ability to discount the recommendations of existing respected national standards and, "promulgate similar construction or decommissioning standards as it deems necessary." Any attempt to further regulate wells outside of these standards would require an amendment to the Pennsylvania UCC.

PBA continues to object to any language that gives the EQB or DEP the authority to develop a presently-unknown different set of standards, to be written sometime in the future, for well construction in Pennsylvania. The likely result of such an effort would be increased costs for Pennsylvanians who will rely on well water for their homes. We respectfully request the Committee amend House Bill 48 to require the EQB to incorporate by reference the ANSI/NGWA construction and decommissioning standards.



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in delivering quality living environments.*



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On behalf of the Pennsylvania Builders Association and the more than 255,000 members and employees it represents, I thank you again for the opportunity to comment.

Very Truly Yours,

Sarah E. Miller  
Pennsylvania Builders Association



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