


The National Ground Water Association requests that the following change (see highlight) be made to the paragraph on page 1 of the [Draft 1 Version 3.0 Geothermal Heat Pumps Specification](#) 

offer and encourage training to distributors and/or contractors on the following issues: proper 43 equipment installation and hookup, distribution systems and their effect on performance, proper 44 domestic water heater connection for desuperheater or demand water heating, code compliance, and 45 proper use of the Manual J calculation, or other equivalent calculation, in order to encourage proper 46 sizing of equipment. In addition, Partner should strive to use contractors or loop installers who have 47 received training on the design and installation of the ground heat exchanger and that provide 48 warranty protection for the integrity and performance of the ground heat exchanger for at least two 49 years. Ground heat exchanger training may be provided by Partner or a well regarded training program such as the International Ground Source Heat Pump Association's, **National Ground Water Association's or other recognized training programs.**

Justification for change: The National Ground Water Association is a well regarded organization in the geothermal heat pump field. The Association, working with others including the Geothermal Heat Pump Consortium, is updating the Association's Guidelines for Vertical Borehole Construction. Additionally, the Association is leading an effort to survey states regarding geothermal heat pump regulations and is a member of an advisory committee to the Department of Energy's geothermal program. The association has held training programs and is well recognized in the field. To mention only one organization, inadvertently provides a market advantage that I do not believe is U.S. EPA's intent.

If you have any questions regarding this request, please contact me at:

Christine Reimer  
National Ground Water Association  
601 Dempsey Rd  
Westerville, OH 43081  
800.551.7379, ext. 560  
[creimer@ngwa.org](mailto:creimer@ngwa.org)