

ASDWA is the professional association that serves the leaders (and their staff) of the 57 state and territorial drinking water programs. Formed in 1984 to address a growing need for state administrators to have national representation, ASDWA has become a respected voice for states with Congress, EPA, other Federal agencies, and professional organizations in the water sector. ASDWA's members have worked closely with EPA on the development and implementation of all the National Primary Drinking Water Regulations (NPDWRs).

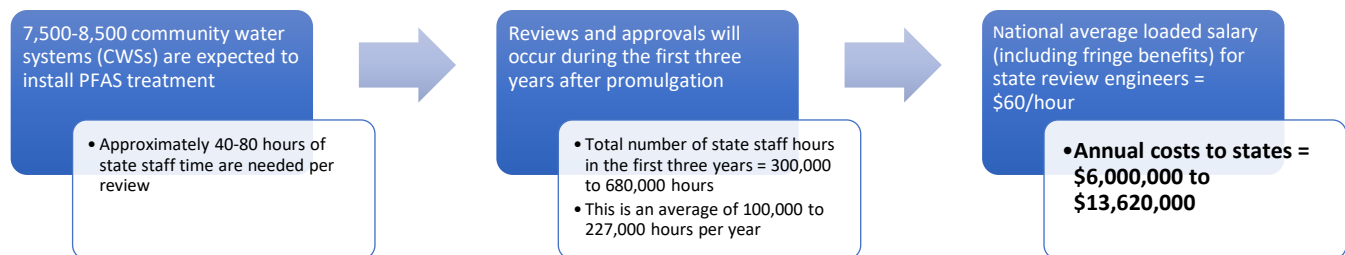
States Will Incur Costs from the PFAS Regulation

While the water systems will incur significant compliance costs for the construction, operation, and maintenance of additional treatment facilities for compliance with the PFAS regulation, states will also incur cost increases for reviews and implementation of this regulation. Initially, state staff will spend significant time reviewing pilot testing plans, evaluating pilot data to ensure the appropriate treatment is selected to remove PFAS, approving plans and specifications for the specified treatment, issuing permits for each system, and, finally, providing oversight for startup and installation of treatment. As treatment is implemented (in perpetuity), states will spend time reviewing compliance data, making compliance determinations, and ensuring treatment operators are appropriately certified and qualified.

Estimate of State Staff Costs for Treatment Review

EPA has proposed a PFAS regulation for PFOA and PFOS, assuming MCLs of 4 ppt for both, that will require additional advanced treatment at approximately 7,500-8,500 water systems. State engineers have the responsibility to ensure that the additional treatment is appropriately selected and designed to meet the regulation, without negatively affecting existing treatment. Selecting the appropriate treatment requires pilot testing, which entails testing smaller treatment units for a short period of time to ensure that the treatment goals are met under the site-specific raw water quality conditions. Once the treatment technology is selected, plans and specifications are developed and those must be reviewed and approved by the state. If State Revolving Loan Fund (SRF) financing is used, the state must make periodic inspections as part of its fiduciary responsibility. Finally, states must ensure the treatment startup works and that appropriately certified operators are in place to oversee the treatment.

The estimated staff time and costs for these reviews and approvals are shown below:



These additional costs represent approximately 5%-12% of the current annual Public Water Supply Supervision (PWSS) funding from EPA to states. PWSS is the primary funding used by most states for implementation of all NPDWRs. Furthermore, state review engineers are currently overloaded with reviews of grant applications, preliminary engineering reports (PERs), etc., to implement projects receiving Bipartisan Infrastructure Law (BIL) funding.

Other State Staff Costs

In addition to the significant costs associated with state engineering reviews, EPA's proposed PFAS regulation is expected to affect several other components of the state drinking water programs. Several states conduct sampling and analysis for their water systems; these states expect increases in laboratory costs associated with regular PFAS sampling. All states will have to update their data management systems to support the PFAS regulation, as EPA's data reporting system does not currently support the PFAS regulation. States also anticipate increased costs for compliance determinations and eventual enforcement of the regulation, efforts to update operator certification requirements for PFAS treatment, and for updates to sanitary survey or inspection requirements to ensure ongoing treatment systems continue to be effective in the long term.

GAC Contactor Recommended Features

