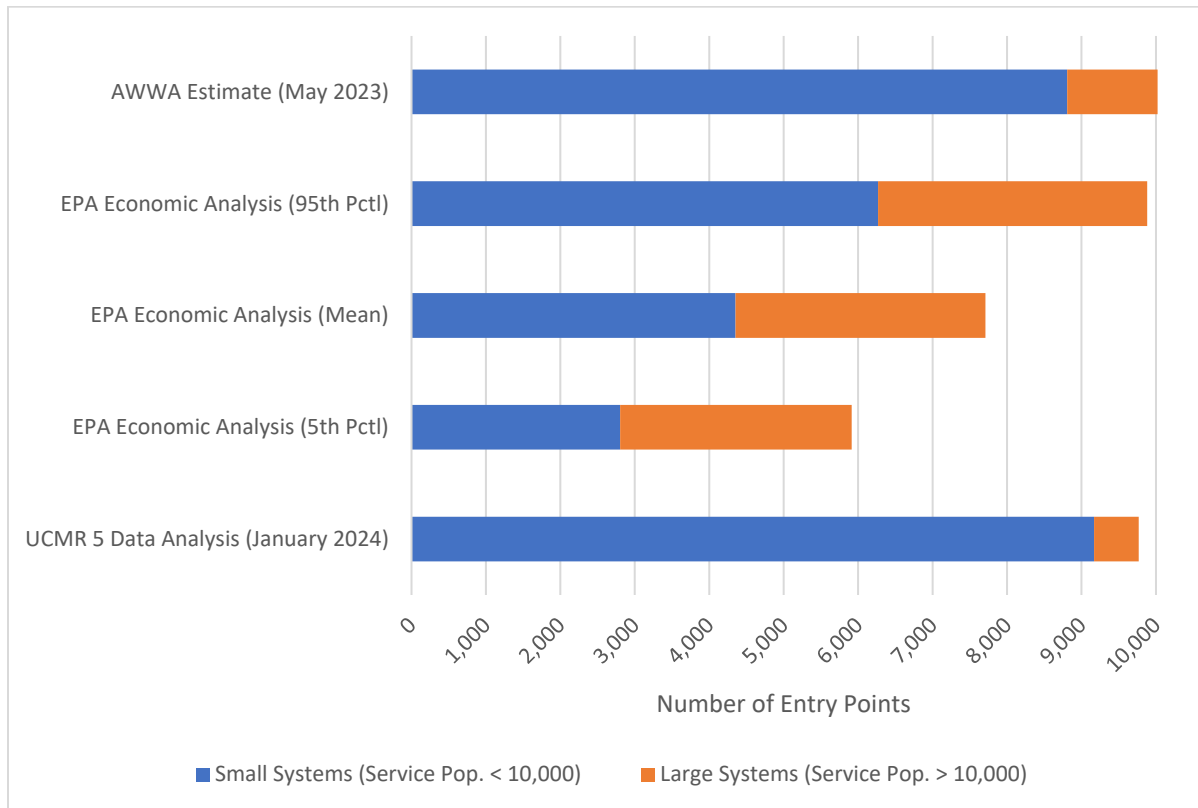


In January 2024 the EPA released the third round of monitoring data under the Fifth Unregulated Contaminant Monitoring Rule (UCMR 5). The release included monitoring data from 29 PFAS, including the six PFAS included in the proposed drinking water regulations, from more than 3,700 water systems across the United States. AWWA has conducted a preliminary analysis of this data to characterize the national impact of the proposed standards using an approach similar to how EPA has conventionally analyzed data to promulgate drinking water regulations. Monitoring data was assessed based on the water system's source and size category and relies on the maximum observed level of PFAS in comparison to the proposed standards.

The following figures are results of this analysis and look at the national impacts of the proposed standards of 4 ppt PFOA, 4 ppt PFOS, and/or the hazard index of 1.0 for PFHxS, PFNA, HFPO-DA, and PFBS as well as the proposed alternative standards of 10 ppt PFOA and 10 ppt PFOS. As a point of comparison, the national impact estimates using UCMR 5 data are presented alongside the results of EPA's economic analysis and the results of AWWA's occurrence analysis from 2023.

Figure 1 – Number of Entry Points to the Distribution System Impacted by the Proposed Standard (4 ppt PFOA, 4 ppt PFOS, and/or Hazard Index of 1.0 for PFHxS, PFNA, PFBS, and HFPO-DA)



The data in Figure 1 show that the total number of entry points impacted by the proposed standards is already expected to reach the 95th percentile estimate from the EPA's Economic Analysis. Additionally, the UCMR 5 data demonstrates that the overwhelming majority – 90% – of the entry points impacted will be at small water systems serving less than 10,000 persons whereas EPA's economic analyses estimated that this number would not exceed 65%. The UCMR 5 based estimate similarly aligns with the results of AWWA's estimate in 2023.

Figure 2 – Number of Entry Points to the Distribution System Impacted by the Alternative Standards (10 ppt PFOA and/or 10 ppt PFOS)

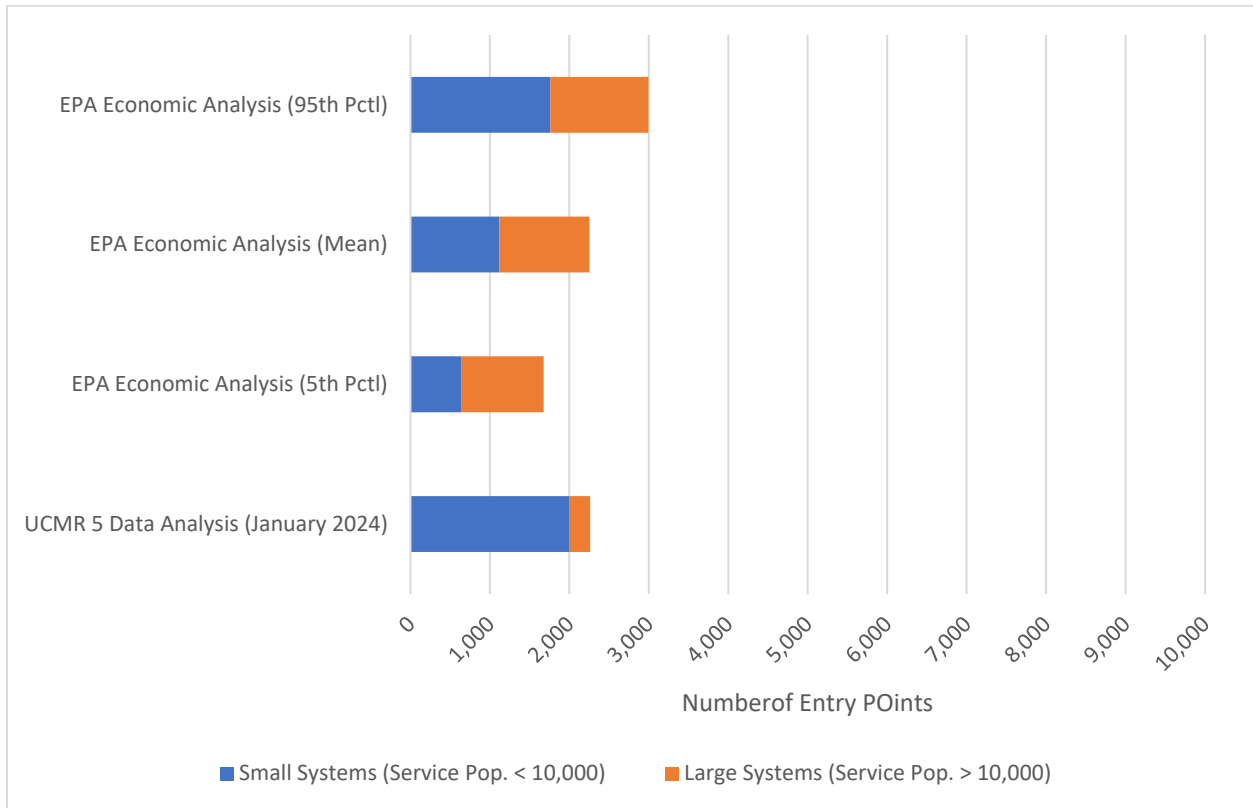


Figure 2 shows that the EPA’s economic analysis for the impacts of the 10 ppt PFOA and 10 ppt PFOS standards is closer to the actual occurrence. However, again the number of entry points for small systems impacted is higher than EPA anticipated – 83% for the 10 ppt PFOA and 10 ppt PFOS standards. As with the proposed standards, the EPA’s economic analysis estimated that small system entry points would make up approximately half of the total entry points impacted.

On the following page, Figure 3 shows the estimate of the total population served by entry points impacted by the proposed standards. This figure shows that the total population impacted is lower than the EPA’s economic analysis – including the 5th percentile estimate by a significant margin. This figure also confirms that the overall population served by impacted entry points will be in large systems not small systems despite that the majority of systems needing to invest in treatment facilities will be small systems. Figure 4 shows similar results.

Figure 3 – Total Population Served by Entry Points Impacted by the Proposed Standard (4 ppt PFOA, 4 ppt PFOS, and/or Hazard Index of 1.0 for PFHxS, PFNA, PFBS, and HFPO-DA)

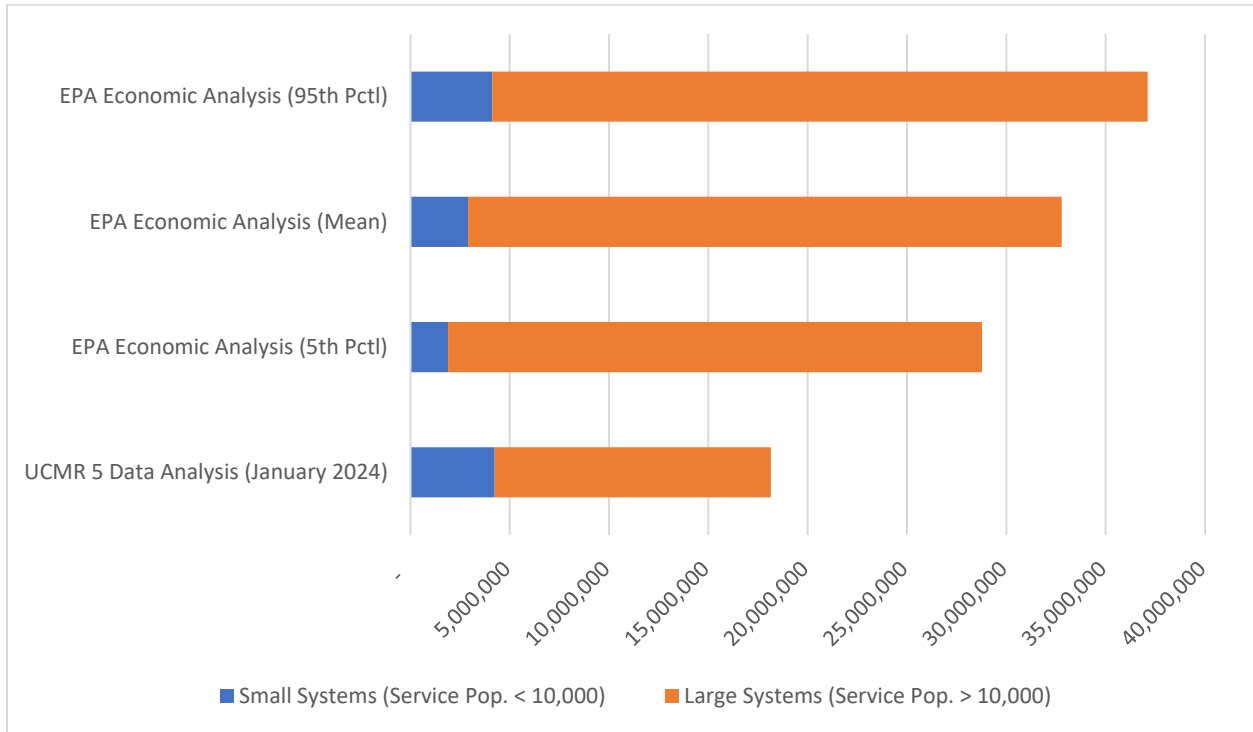


Figure 4 – Total Population Served by Entry Points Impacted by the Proposed Standard (10 ppt PFOA and/or 10 ppt PFOS)

