



ASDWA Statement on Proposed PFAS Drinking Water Standards

ASDWA supports EPA's proposed drinking water standards for PFOA, PFOS, and four other PFAS. EPA's proposal to regulate PFOA, PFOS, and four other PFAS in drinking water is a step in the right direction to provide national consistency for assessing and addressing PFAS in drinking water.

The EPA's announcement now starts the public review and comment processes that will take place over the next several months, which could possibly result in revisions to the proposed MCLs and MCLGs. ASDWA and its members will carefully review the proposed MCLs and MCLGs and develop comments to provide meaningful input to the regulatory process to ensure the final rule is implementable and effective for protecting public health.

ASDWA's members will ensure that systems across the country are able to comply with the final regulations. However, these proposed MCLs and MCLGs - as announced - create significant challenges in several areas for drinking water programs and for water systems across the country.

The proposed standards are very close to the detection/reporting limits for PFOA and PFOS, and states will be responsible for the certification of laboratories to ensure accurate compliance monitoring results.

As announced, the proposed MCLs will require thousands of public water systems across the country to add advanced treatment to their current water production processes. States will have to review and approve the plans and specifications for this advanced treatment. In addition to the need for systems to conduct pilot testing of multiple treatment options, the construction, operations, management, and sampling costs for these systems are in the millions, tens of millions, and even hundreds of millions of dollars.

While the funding from the Bipartisan Infrastructure Law (BIL) provides billions of dollars in assistance to water providers, significant rate increases will be required for most of the systems impacted by the proposed MCLs. Federal funding won't be able to cover all the construction projects, as well as ongoing increased operation and maintenance costs. The funding necessary will also compete with other EPA mandates, including compliance with the Lead and Copper Rule Revisions (LCRR) and recently announced cybersecurity measures.

There are also likely to be considerable supply chain issues. The number of advanced treatment systems that will be required is significant and they will need to be constructed in an accelerated period of time. These challenges also apply to the supply of the media required, the treatment vessels, etc., required for the construction of the treatment.

Workforce is another issue, as the water sector faces the same issues as other sectors. The proposed MCLs and the advanced treatment systems they will require will greatly increase the need for additional water operators in thousands of communities across the country. In addition, many currently employed operators will need to achieve higher levels of certification to manage and maintain their new systems. Achieving these certifications will require staff time and resources that will challenge the sustainability of many smaller water systems.