



# PFAS Cost of State Transactions Study (PCoSTS)

Background Information

PFAS CoSTS (PCoSTS) is an adaptation of the Costs of State Transactions Study (CoSTS) ASDWA developed for the Revisions to the Lead and Copper Rule (LCRR). PCoSTS estimates the additional burden for primacy agencies associated with the recent proposed PFAS regulation. PCoSTS was developed with the assistance of ASDWA's State Resources and Economic Costs Workgroups.

ASDWA's Workgroups divided the PFAS proposal into five major categories for the five tabs in the spreadsheet. The assumptions in each tab are intended to guide the reader on what is included in each estimate. It should be noted that PCoSTS is a national estimate for the 49 states with primacy. Each state will have unique estimates for activities from this regulation.

The Reviewing and Approving Treatment (R&A Treatment) tab is divided by system size (CWS and NTNCWS). ASDWA's Model utilizes the following system size breakdown:

- Small <=3,300
- Medium 3,301-50,000
- Large >50,000

Model Data Sources

Links to all sources can be found in the Sources tab.  
ASDWA pulled information from EPA's proposed PFAS regulation (88 FR 18638) in part F: Combining State Data With Model Output To Estimate National Exceedance of Either MCLs or Hazard Index.  
ASDWA used the average compensation costs for state and local government from the US Bureau of Labor Statistics at \$57.60.  
System numbers were pulled from SDWIS Federal Reports Search on 4/25/23.

49,416 CWS	6300 divided by 66627 = 9.5%
17,211 NTNCWS	EPA estimates 3400 to 6300 systems will be impacted
66,627 Total	9.5% of systems impacted using 6300 estimate

	<=3,300	3,300-50,000	>50,000
CWS	39,920	8,450	1,046
NTNCWS	17,019	196	6
Total around 6300	56,939	8,646	1,052
% Systems in size	85%	13%	2%

## Costs of States Transactions Study for EPA's PFAS Proposal (PCoSTS) Association of State Drinking Water Administrators (ASDWA)

The summary below is based on five categories taken from EPA's proposed PFAS rulemaking and state input from ASDWA workgroups. The first year of implementation includes the initial review and approval of all treatment and regulatory start-up activities. Cost is estimated on the state and local 2023 government employee average hourly rate of \$57.60

### First Year of Implementation

	Estimated Staff Hours	Estimated Cost
Regulatory Start-Up	210,700	\$ 12,136,320
Annual Reporting	7,350	\$ 423,360
Water System/Operator TMF Assistance and Training	73,500	\$ 4,233,600
Reviewing and Approving Treatment (R&A Treatment)	503,200	\$ 28,984,344
Compliance	245,000	\$ 14,112,000
<b>Grand Total</b>	<b>1,039,750</b>	<b>\$ 59,889,624</b>

### Annual Rule Requirements After First Year of Implementation

Annual Reporting	7,350	\$ 423,360
Water System/Operator TMF Assistance and Training	73,500	\$ 4,233,600
Compliance	245,000	\$ 14,112,000
<b>Grand Total</b>	<b>325,850</b>	<b>\$ 18,768,960</b>

### Regulatory Start-up

Model Inputs

Model Outputs

Assumptions:

1. Estimate includes efforts creating or modifying existing reports (CCR, SDWIS updates, monitoring schedule templates, etc.)
2. Estimate includes the development of training.
3. Estimate includes the development of templates materials and resources
4. Includes state staff review of the rule.
5. Includes training of state staff on rule implementation.
6. Estimate includes public outreach and education, including hosting meetings for the general public.
7. Includes work associated with lab accreditation.
8. Estimate includes migration of existing data.

States	Hours Ea.	Total Hours
49	4000	196000

### Primacy Package Application

Assumptions:

1. Estimate includes updating and making state regulatory changes to the rule.

States	Hours Ea.	Total Hours
49	300	14700

## Annual Reporting

Assumptions:

1. Includes enforcement actions and reporting violations to EPA.
2. Includes responding to EPA system-specific issues.
- 3.. Includes reporting standard monitoring results to EPA.

	Model Inputs
	Model Outputs

States	Hours Ea.	Total Hours
49	150	7350

## Water System/Operator TMF Assistance and Training

Assumptions:

1. Estimate includes answering operator questions.
2. Includes travel costs of in-person training.
3. Includes assisting systems with funding applications.

States	Hours Ea.	Total Hours
49	1500	73500

## Reviewing and Approving Treatment

### Assumptions:

1. Assumes an average across states, with variability between states.
2. Includes primacy agency review and consult on source water changes.
3. Includes state assistance with building infrastructure.
4. Includes assisting systems in finding consultants.
5. Assumes review of pilot projects is included in this estimate.

System Size	# of Systems Needing Treatment	Hours Ea.	Total Hours
Small	5,380	80	430,410
Medium	949	70	66,460
Large	127	50	6,330

	Model Inputs
	Model Outputs

System #	System Type
4,695	CWS
1,635	NTNCWS
6,330	Total

## Compliance

### Assumptions:

1. Includes assisting out of compliance systems and assisting system to remain in compliance.
2. Includes pursuing enforcement actions.
3. Includes the updating of inspection SOPs.
4. Estimate includes additional sanitary survey work (additional file tracking and time in field).
5. Estimate includes reviewing/establishing initial compliance schedules
6. Estimate includes staff time checking in with system violations.
7. Estimate includes reviewing sample results.
8. Includes reviewing system variances and exemptions.

States	Hours Ea.	Total Hours
49	5000	245000

