



## **ASDWA Statement on Final PFAS Drinking Water Standards**

### **ASDWA supports EPA's drinking water standards for PFOA, PFOS, and four other PFAS.**

EPA's drinking water standards for PFOA, PFOS, and four other PFAS in drinking water are a step in the right direction to provide national consistency for addressing PFAS in drinking water. Now the challenging work for the primacy agencies begins so that this rule is implemented effectively to protect public health.

ASDWA's members will ensure that systems across the country have the tools and assistance to comply with this rule. Additional guidance in several key areas of the rules is needed from EPA soon to assist both state drinking water programs and systems to prepare for implementation. Additionally, this rule creates significant challenges in several areas for drinking water programs and for water systems such as laboratory certification, balancing multiple EPA priorities with limited workforce, operator certification, and managing federal grants.

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

The standards will require thousands of public water systems across the country to add advanced treatment to their current water treatment. States will have to review and approve the plans and specifications for this advanced treatment, competing with increased workloads from other regulations such as the Lead and Copper Rule Revisions/Improvements (LCRR/LCRI) and infrastructure projects being funded by the Infrastructure Investment and Jobs Act (IIJA). In addition to the need for systems to conduct pilot testing of multiple treatment options, the construction, operations, management, and sampling costs will be significant and will likely extend into billions of dollars.

Workforce is another issue, as the water sector faces similar issues as other sectors. The advanced treatment systems resulting from these standards 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 the advanced treatment to remove PFAS. Achieving these certifications and retaining qualified operators will take additional time and resources that will challenge the sustainability of many smaller water systems.

While the IIJA funding is providing billions of dollars in assistance to water providers, significant rate increases will be required for most, if not all, of the systems impacted by the PFAS standards. Federal funding is insufficient to cover all the construction projects, as well as ongoing increased operation and maintenance (O&M) costs. O&M costs are ineligible for Federal funding and must be supported by fees from the system's customers. The funding needed for compliance with the PFAS standards will also compete with replacing aging infrastructure, ongoing cybersecurity concerns and other EPA mandates, such as the LCRR/LCRI. Supply chain issues, scarcity of construction contractors, and competition for

qualified engineers have increased construction costs over the past few years. Working to comply with the PFAS standards will only add to these ongoing challenges.

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*The Association of State Drinking Water Administrators (ASDWA) is the national, non-partisan, non-profit association representing the 50 state primacy agencies, the five territories, the District of Columbia, and the Navajo Nation. Founded in 1984, ASDWA's members work tirelessly to effectively implement drinking water regulations and protect public health.*