PFAS CoSTS Model: Association of State Drinking Water Administrators Releases Adaption of the Cost of State Transactions Study

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06/02/2023

The Association of State Drinking Water Administrators ("ASDWA") announced the release of a document titled:

PFAS Cost of State Transactions Study ("PCoSTS")

The *PCoSTS* is a model adapted from the organization's previously issued Costs of State Transactions Study ("CoSTS").

The CoSTS had been developed by ASDWA to address the U.S. Environmental Protection Agency's ("EPA") Revisions to the Safe Drinking Water Act Lead and Copper Rule. In turn, the PCoSTS provides estimates of the additional burden for primary agencies associated with EPA's proposed Safe Drinking Water Act PFAS rule.

PCoSTS is a national estimate for the 49 states with primacy for the Safe Drinking Water Act.

PCoSTS is stated to have been developed with the assistance of ASDWA's workgroups:

- State Resources
- Economic Costs

The workgroups are stated to have divided the EPA PFAS proposed rule into five major categories.

The five categories address estimated staff hours and associated cost for the proposed rule first year of implementation. Those categories include:

- Regulatory Start-Up
- Annual Reporting
- Water System/Operator TMF Assistance and Training
- Reviewing and Approving Treatment
- Compliance

Categories addressed after the first year of implementation include:

- Annual Reporting
- Water System/Operator TMF Assistance and Training
- Compliance

By way of example, ASDWA states that *PCoSTS* hours and cost for a state agency for the first year of implementation will be 1,039,750 hours and a cost of $59,889,624.

ASDWA describes itself as a professional association serving state drinking water programs.

The Arkansas Department of Health implements the Safe Drinking Water Act in Arkansas.

A copy of the *PCoSTS* can be downloaded here.