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Cost Analysis of the Impacts on Municipal Utilities and Biosolids Management to Address PFAS Contamination: NACWA/nebra/Water Environment Federation Report

11/04/2020

The National Association of Clean Water Agencies (“NACWA”) announced the issuance of a report titled:

Cost Analysis of the Impacts on Municipal Utilities and Biosolids Management to Address PFAS Contamination (“Report”)

The *Report* is stated to have been published by CDM Smith in collaboration with NACWA, the Water Environment Federation and the North East Biosolids & Residuals Association.

The cost impacts of PFAS policies and regulations at 29 publically owned treatment works (“POTWs”) and biosolids management facilities are quantified. The facilities addressed are stated to be located principally in the New England region. However, several of the participating facilities are stated to have been located in other states throughout the United States.

PFAS consists of a large group of man-made chemicals that include perfluorooctanoic acid, perfluorooctane sulfonate, and GenX chemicals. Their properties include resistance to heat, water, and oil. Further, they have been described as persistent in the environment and resist degradation.

The compounds have been used in various industrial applications and consumer products such as:

- Fabrics for furniture
- Paper packaging for food and other materials resistant to water, grease or stains
- Firefighting airfields
- Utilization in several industrial processes

Potential human exposure to PFAS includes pathways through drinking water, air or food.

As noted in a previous blog post (see post [here](#)), several states have addressed PFAS in their Clean Water Act National Pollution Discharge Elimination System (“NPDES”) permitting or related activities. Examples have included:

- Industrial discharges
- POTWs
- Stormwater permits
- Pretreatment

Concern has been expressed that POTWs receive discharges that may contain PFAS from some commercial and industrial sources. A further complication is the fact that conventional POTW wastewater treatment does not effectively remove PFAS that it receives. They may be passed through treatment to waterbodies or interfere with management of solids from the treatment process.

The *Report* notes by way of introduction that its objective is to:

. . . produce informative materials to share with federal, state, and local legislators, regulators, government officials, and the broader public to inform PFAS policy decisions and identify unintended consequences. This is important to ensure that PFAS “receivers” -- like water resource recovery facilities (WRRFs) and thus their rate payers -- are not unduly penalized for receiving and processing PFAS that they did not produce, while appropriately protecting public health.

Besides providing some background on PFAS related issues, the *Report* addresses in four sections:

- Data on Actual Costs of Wastewater and Biosolids Management Programs from PFAS
- Case Studies
- Summary of Indicator Cost and Technology Information
- Relevant Studies and Articles

A couple of the conclusions of the *Report* may be of interest. For example, the cost of biosolids management of the facilities surveyed is stated to have grown by 37 percent in response to PFAS regulations.

Land application/beneficial reuse of biosolids is stated to have experienced the most significant cost impacts. A comparison of biosolids disposal cost before and after PFAS regulations is also addressed. The *Report* states that the utilities surveyed found a doubling in cost to switch from beneficial reuse to landfill disposal.

A copy of the *Report* can be downloaded [here](#).