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PFAS Policy Landscape: Costs & Impacts

October 19, 2023



Our Approach

- Support accelerating cleanup, based on the best science and risk.
- All PFAS are not the same.
- Costs and impacts must be considered.
- Many valuable societal applications and critical uses for national security and public safety.
- CERCLA is not the right policy tool.



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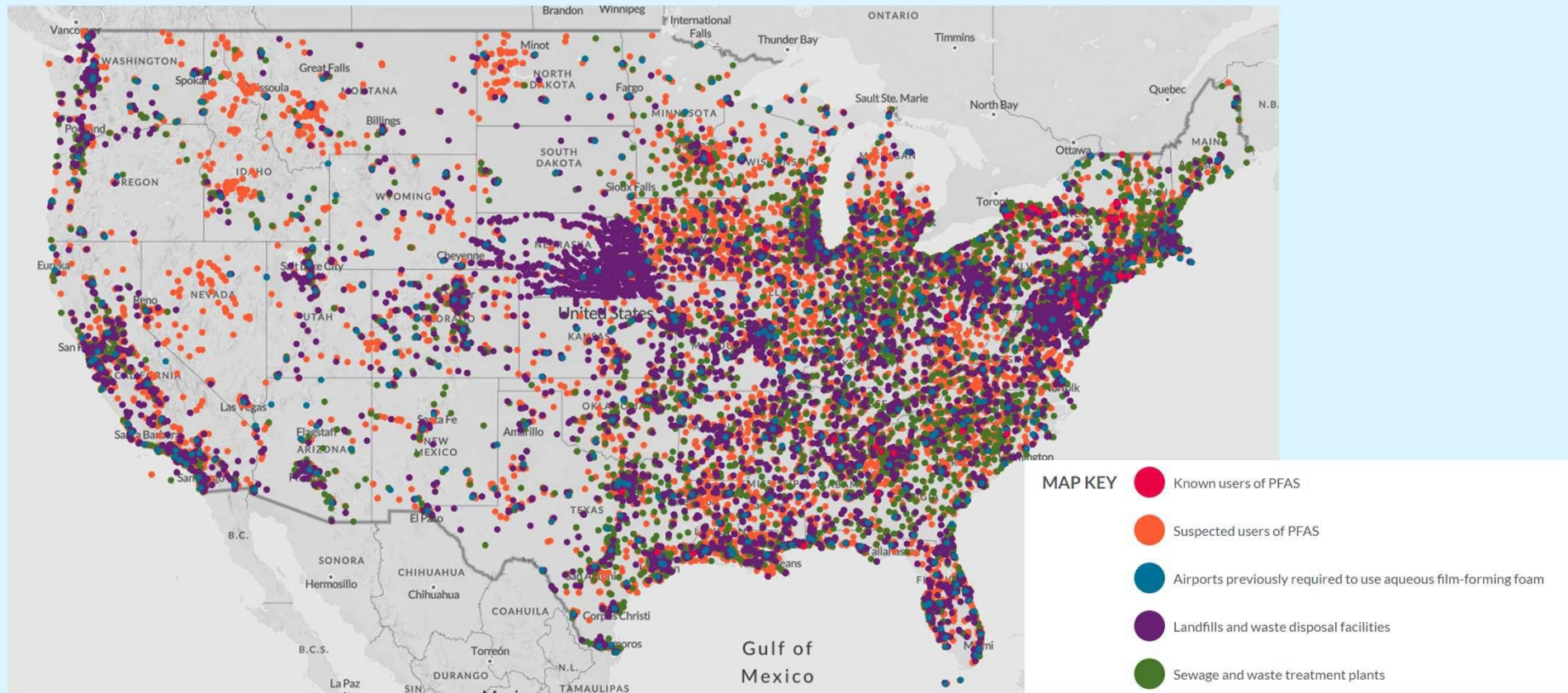
EPA's Strategic Roadmap

OCSP	OLEM	ORD	Water
Testing strategy	CERCLA PFOA/PFOS	Treatment R&D	UCMR 5
TRI	CERCLA ANPRM		MCL PFOA/PFOS
New PFAS Review	Disposal guidance	R&D	HALs
TSCA 8 (a)7	RCRA		ELGs



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Geographic Perspective



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Source: https://www.ewa.org/interactive-maps/2021_suspected_industrial_discharges_of_pfas/map/

Costs and Implications

Regulation	Total Costs (3%)	Total Net Benefits (3%)
Final PFAS Reporting Rule	\$845,000,000	Not Quantified
Proposed CERCLA Rule*	\$370,000	Not Quantified
Proposed Drinking Water Rule	\$771,770,000	\$461,210,000

*Chamber of Commerce Analysis estimates costs at \$17.4 billion

<https://www.uschamber.com/environment/pfos-and-pfoa-private-cleanup-costs-at-non-federal-superfund-sites>



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CERCLA Challenges

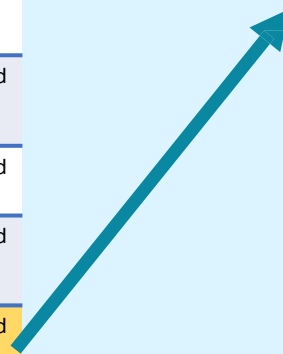
- Novel authority.
- Numerous unintended outcomes.
- Insufficient information to properly assess.
- Significant costs and impacts on companies and communities.



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EPA's Economic Assessment

Cost Impact	Impact Type	Annual Cost 2020 \$
Release notification cost	Direct	\$0 - \$370,000
Hazardous Materials Transportation Act (CERCLA Section 306(a))	Direct	\$0
Notice of sale or transfer of federally owned property (CERCLA Section 120)	Direct	Unquantified
Remediation technology R&D	Indirect	Unquantified
Response and Investigation Cost Recovery (CERCLA Section 102)	Transfer	Unquantified
NPL Cleanup	Indirect	Unquantified



EPA-Stated Data Gaps

- “incremental cost of addressing PFOA and/or PFOS relative to baseline costs of cleaning other contaminants on existing NPL sites is unknown.”
- “number and types of sites that might need response activities along with information on the magnitude and extent of PFOA and PFOS contamination”
- “the cleanup standards that must be met by remedial activities”
- “technologies, and their associated costs, for assessing and remediating the various contaminated material at sites.”



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Monte Carlo Results

Billions (2021\$)

Mean PRP Cost (N = 10,000)	All NPL Sites	Existing NPL Sites	New NPL Sites
<i>Present Value, 3% Discount Rate</i>			
Total	\$21.8	\$17.2	\$4.3
Annualized Cost (30 Years)	\$1.1	\$0.9	\$0.2
<i>Present Value, 7% Discount Rate</i>			
Total	\$11.0	\$9.7	\$1.2
Annualized Cost (30 Years)	\$0.8	\$0.7	\$0.1

Notes: Existing NPL sites include final, proposed, and deleted NPL sites. Assumes the CERCLA designation adds 200 sites to the NPL. PRP is Potentially Responsible Party.



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Cleanup Costs are One Piece of the Economic Impact

- Waste treatment
- Waste disposal
- Real estate transaction costs
- Land values (+/-)



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Source: <https://www.epa.gov/superfund/superfund-site-assessment-h>

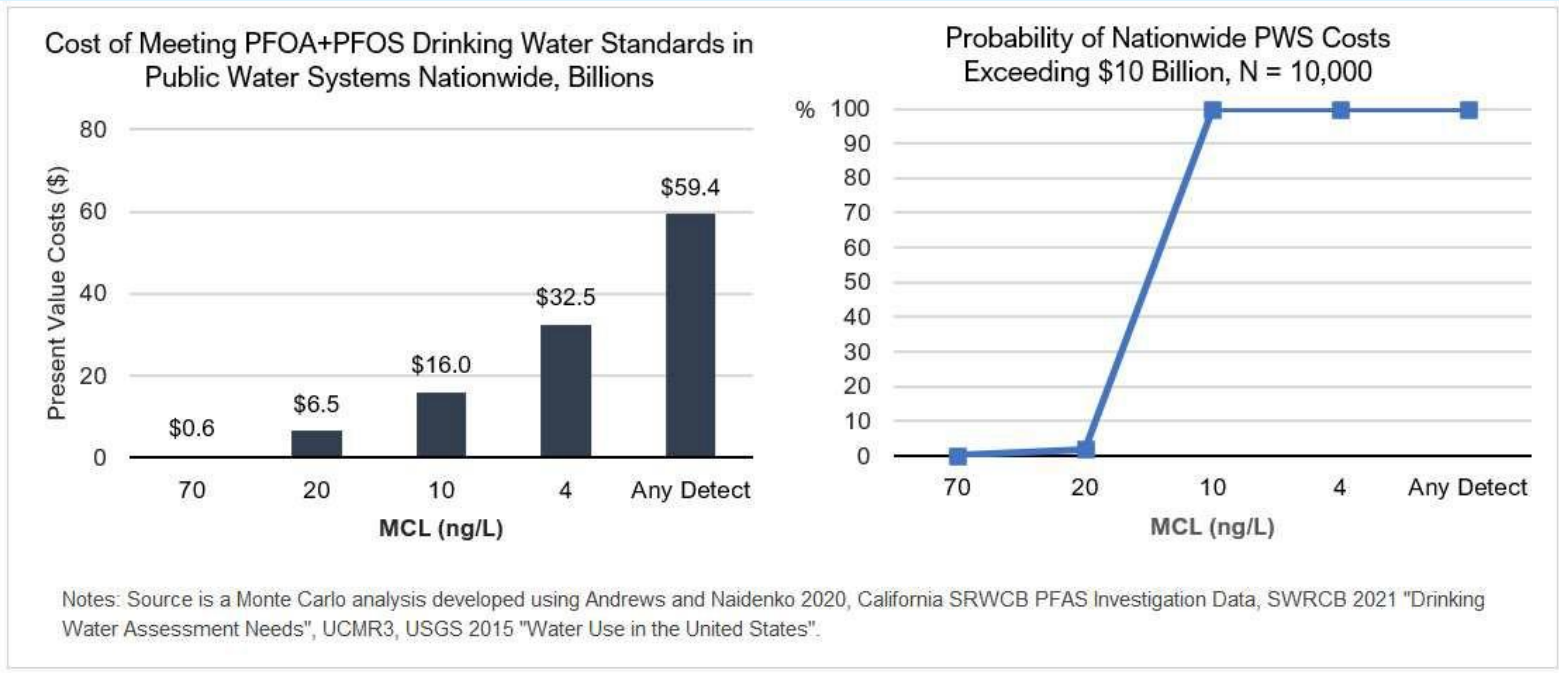
Local Costs

Table 1: Summary of Findings: Estimated Annual Cost Increases per Household (\$/year/HH)

Municipality	Baseline	Post Reg	Increase
Charleston, WV	1,168	1,487	319
Portland, ME	2,093	2,693	600
Lumberton, NC	457	1,485	1,028
Wixom, MI	472	949	383
Merced, CA	1,576	1,936	360



Drinking Water Compliance Costs Quickly Reach Tens of Billions



Notes: Source is a Monte Carlo analysis developed using Andrews and Naidenko 2020, California SRWCB PFAS Investigation Data, SWRCB 2021 "Drinking Water Assessment Needs", UCMR3, USGS 2015 "Water Use in the United States".

EU PFAS Restrictions Economic Impact

Metric	Total Impacts	Unit
Employment	502,000	Jobs (units)
Output	\$168	2022 USD (billions)
GDP	\$81	2022 USD (billions)
Labor Income	\$46	2022 USD (billions)
Federal Tax Revenues	\$12	2022 USD (billions)
State and Local Tax Revenues	\$7	2022 USD (billions)

Total economic and fiscal impacts of goods exported from the U.S. to the European Union that contain PFAS in 2022



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Alternative Authorities to CERCLA

- Existing Superfund sites.
- Brownfields grants.
- RCRA permitted facilities and corrective action.
- Section 1431 SDWA emergency authority.
- Emergency CWA and other authorities (e.g., spills).



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