



---

# PFAS Briefing

## U.S. Conference of Mayors

---

January 17, 2024

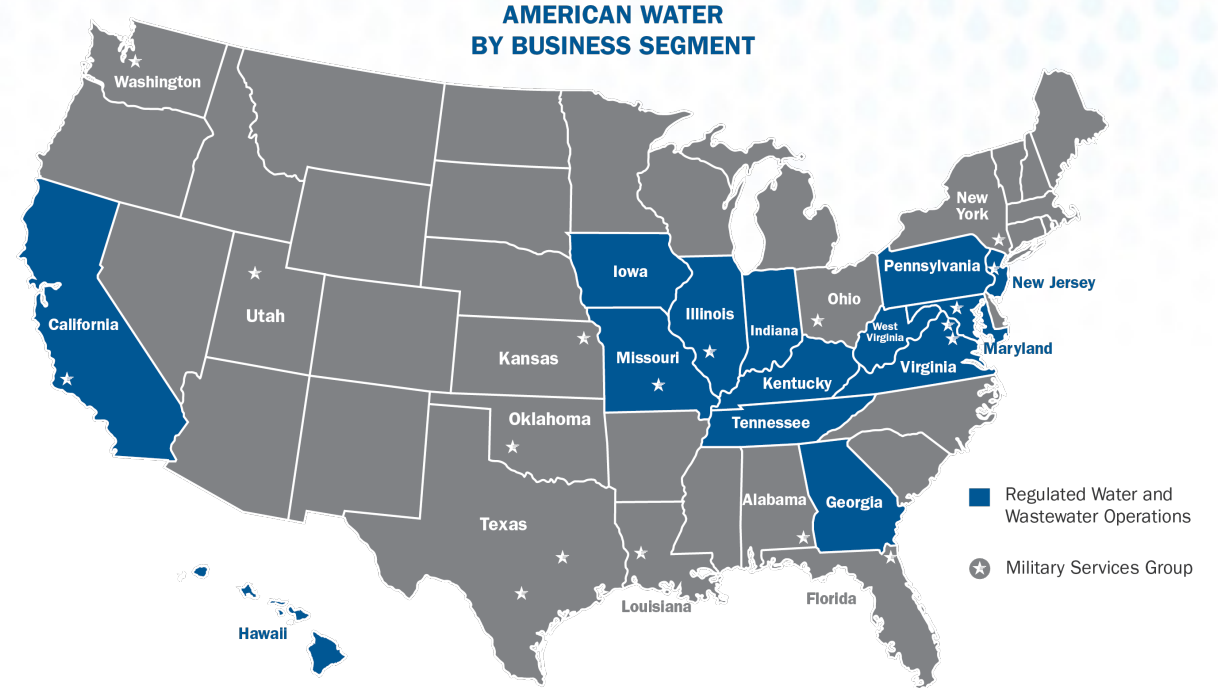
David Choate, Vice President, Engineering

American Water

# American Water Operations

We operate as regulated utilities in 14 U.S. states. Our primary operating assets include approximately:

- **80** surface water treatment plants
- **490** groundwater treatment plants
- **175** wastewater treatment plants
- **53,500** miles of transmission, distribution and collection mains and pipes
- **1,100** groundwater wells
- **1,700** water and wastewater pumping stations
- **1,100** treated water storage facilities
- **73** dams



## Military Services

American Water's Military Services Group partners with the Department of Defense through the Utilities Privatization ("UP") Program.

Through UP, our 50-year contracts allow us to serve as the water and/or wastewater utility system owner at 18 military installations across the U.S.

# EPA's Proposed PFAS Drinking Water Rule

Compound	Proposed MCLG	Proposed MCL (enforceable levels)
PFOA	zero	4.0 ppt*
PFOS	zero	4.0 ppt*
PFNA		
PFHxS	1.0 (unitless)	1.0 (unitless)
PFBS	Hazard Index	Hazard Index
HFPO-DA (commonly referred to as GenX Chemicals)		

The Hazard Index is a tool used to evaluate potential health risks from exposure to chemical mixtures.

Link: <https://www.epa.gov/sdwa/and-polyfluoroalkyl-substances-pfas>

\*ppt = parts per trillion (also expressed as ng/L)

parts per million (ppm)	parts per billion (ppb)	parts per trillion (ppt)
<p>3 drops</p> <p>added to a 42-gallon barrel</p>	<p>1 drop</p> <p>added to a large tanker truck</p>	<p>10 drops</p> <p>added to the Rose Bowl</p>

### What is a Hazard Index?

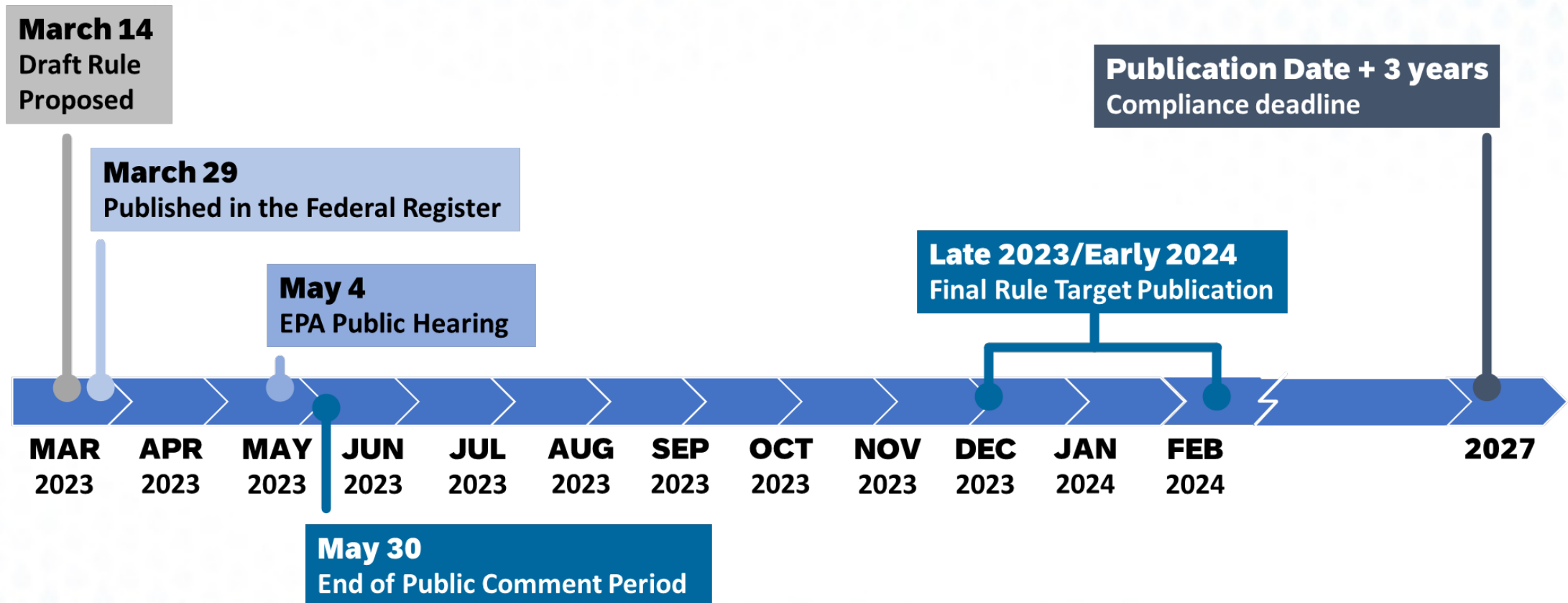
The HI is made up of a sum of fractions. Each fraction compares the level of each PFAS measured in the water to the level determined not to cause health effects (i.e., HBWC).

GenX	PFBS	PFNA	PFHxS	
				= Hazard Index Value

\*All units in parts per trillion (ppt)



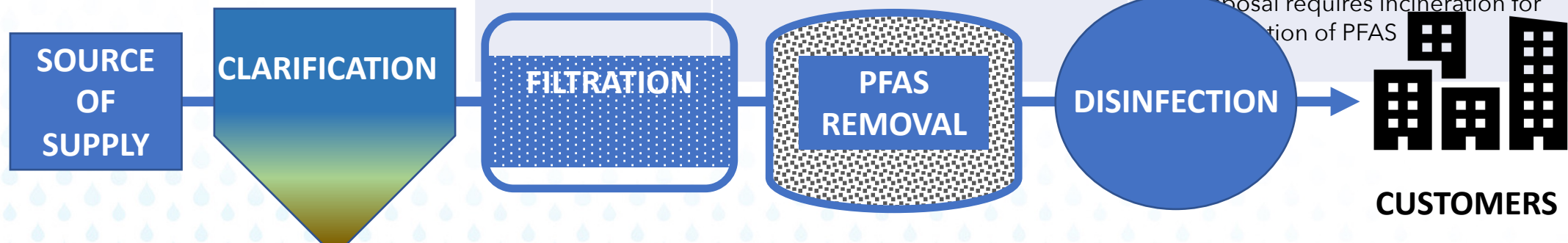
# EPA's Proposed PFAS Drinking Water Rule Timeline



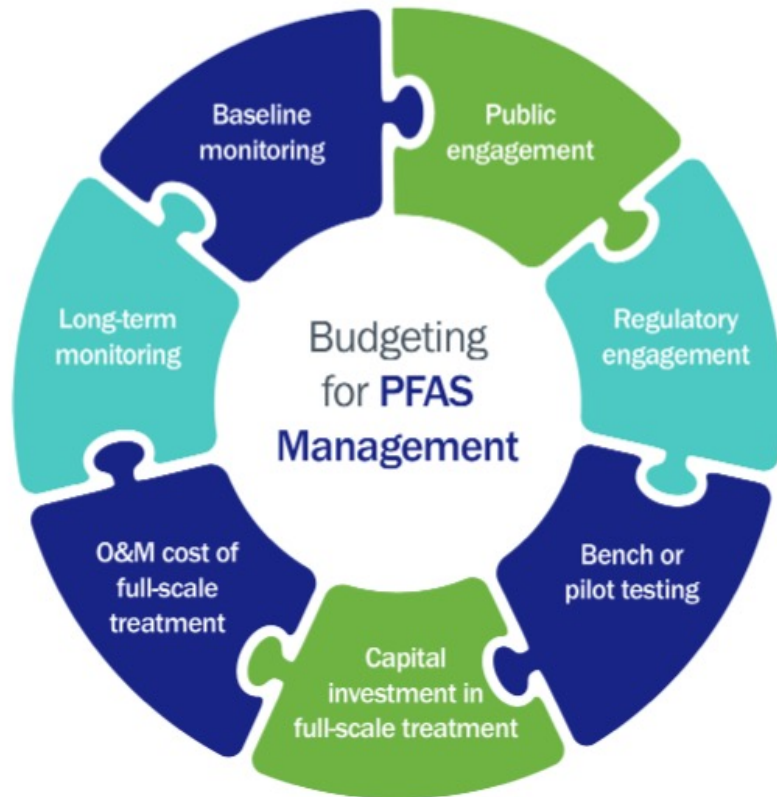
# PFAS Treatment Summary



TECHNOLOGY	ADVANTAGES	DISADVANTAGES
Granular Activated Carbon (GAC)	<ul style="list-style-type: none"> <li>• Easy to use</li> <li>• Reactivation offers destruction of PFAS</li> <li>• Provides removal of other contaminants of emerging concern</li> <li>• Beneficial tool for “common” hazardous chemical spills</li> <li>• Taste and odor benefit</li> </ul>	<ul style="list-style-type: none"> <li>• Larger footprint than IX</li> <li>• Iron and manganese removal sometimes required upstream of GAC</li> <li>• (Generally) higher capital expenses than IX</li> <li>• More frequent replacement of GAC than IX (but much lower cost on a per pound basis)</li> </ul>
Ion Exchange (IX)	<ul style="list-style-type: none"> <li>• Easy to use</li> <li>• Smaller footprint than GAC</li> </ul>	<ul style="list-style-type: none"> <li>• Pre-filtration usually required</li> <li>• Iron and manganese removal more often required upstream of IX than for GAC</li> <li>• Concern with fouling in surface water treatment</li> <li>• Dechlorination (as needed) to prevent NDMA</li> <li>• Disposal requires incineration for destruction of PFAS</li> </ul>



# Projected PFAS Treatment Costs



Source:  
*Consider the Hidden Costs of PFAS Treatment*  
AWWA OpFlow January/February 2021,  
Patricia Whitby, Rosa Yu, Erin Mackey <https://doi.org/10.1002/opfl.1484>

## Federal PFAS Drinking Water Rule Cost Headlines

- EPA estimates a total annualized national compliance cost of **\$772 million to \$1.2 billion** (20-year lifecycle, 3% and 7% discount rates, 2021 dollars)
- American Water Works Association (AWWA) estimates the total annualized national compliance cost of **\$3.9 billion to \$5.2 billion** (20-year lifecycle, 3% and 7% discount rates, 2022 dollars)
  - ❑ **\$47.4 billion initial capital cost**
  - ❑ **\$726 million annual operating cost**
- American Water's internal estimates for PFAS treatment across our own footprint align closely to AWWA's estimates (as scaled from AWWA's national compliance cost estimates)
  - ❑ **~\$1 billion initial capital investment for treatment at approximately 80 facilities across our footprint**
  - ❑ **~\$50 million annual operating cost**

**American Water is currently part of Multi-District Litigation against multiple PFAS manufacturers to support our view that the ultimate responsibility for the cleanup of these contaminants should fall to the polluters**

