

Estimated Economic Impact to Water Operators of Draft Changes to WAC 246-290-315 and WAC 246-290-71006

Greetings Water Operators,

Thank you for your collaboration and time to help develop the draft changes to WAC 246-290-315 and WAC 246-290-71006. The most recent draft language can be found here: [Draft Rule Language for WAC 246-290-315 and WAC 246-290-71006](#). It may be helpful to have this language next to you as you progress through the survey. For more information on PFAS rulemakings, please see link: [Washington State Department of Health - Group A Public Water Supplies - PFAS Rulemaking](#).

Next Steps:

The next step in the rulemaking process is to formally propose the rules using a CR-102 form and to publish this with the Code Reviser so that we can hold a public hearing. As a part of this formal proposal, the State Board of Health (board) and The Department of Health (department) need to do a cost-benefit analysis for this draft rule change (according to [RCW 34.05.328](#)) and to assess whether a Small Business Economic Impact Statement is needed (according to [chapter 19.85 RCW](#)). These economic analyses capture any new costs, both up front and ongoing, any cost savings, and also the benefits of the rule changes. We would like to hear from you so we get an accurate picture of what this might look like for your operation when you need to implement these rules.

Directions:

Please only provide one response per operation.

This survey does not allow you to save your data (e.g., if you do not finish the survey in one session your responses will not be saved, and you will have to start back at the beginning). This survey may take you 25-45 minutes to complete.

At the end of the survey, we have a place for you to insert any additional changes that you think will have cost savings or new costs that we did not include in this survey.

Estimating: It is ideal if you know the response to the question, however the board and department ask that if you do not know the exact answer that you provide your best estimate.

Blank Response vs \$0 cost (no additional cost): It is better to provide an estimate than leave the response blank. In the case that you are not able to provide an estimated response, please leave the question blank. In the case that you know that the question does not have a cost impact on you, please respond with a \$0, rather than leaving the question blank.

Determining cost of compliance: The board and department would like to better understand the additional costs to you for each draft section of the rule. Additional

costs refer to the new costs that would be incurred by changes to the rule. Do not include costs that you already incur. Examples are listed below.

1) No cost (\$0): The draft rule requires you to monitor additional contaminants. You currently monitor all the contaminants in the draft rule, and it meets the draft rule requirements. You would respond that your cost to comply with the draft rule is \$0.

2) New cost: The draft rule requires you to monitor additional contaminants. You do not currently monitor all the contaminants in the draft rule. You would respond by providing cost estimates for the time and labor cost it would take to monitor the additional contaminants.

3) Additional cost to an existing requirement: The draft rule requires you to complete public notification at lower concentrations of contaminants. You are currently monitoring the contaminants, but the draft rule requirements add new reporting requirements for new contaminants and a lower state action level. You would respond by only providing the cost estimate for the time and labor cost it would take to add the increased cost of public notification as a result of monitoring, not the cost of all monitoring.

Definitions:

Cost frequency: Once/One-time costs are costs that only occur once.

Annual recurring costs: Costs that repeat (summarized annually).

What happens to the information you provide?

The information you provide can be an estimate and will help us understand the impact of the draft rule.

To request this document in an alternate format or a different language, please contact the Washington State Board of Health at 360-236-4110 or by email at wsboh@sboh.wa.gov. TTY users can dial 711.

Thank you for taking this extra step to provide us with this information! We request your responses by the close of business August 8, 2025.

*** QUESTION 1**

Information about your business/operation:

Please provide contact information. This information will be used to contact you if we have any follow-up questions about your response.

Contact Name

Business/Operation Name

Contact Email Address

Contact Phone Number

*** QUESTION 2**

How many employees does your operation have?

This information will be used by the board and the department to understand the impact of the draft rule on small businesses in the Small Business Economic Impact Statement.

- ☐ 50 or fewer employees
- ☐ 51 or more employees
- ☐ I'm not sure

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WAC 246-290-315 State action levels (SALs) and state maximum contaminant levels (MCLs)

Below is the current Table 9.

CURRENT TABLE 9

State Action Levels		
Contaminant or Group of Contaminants	SAL	SAL Exceedance Based On:
Per-and polyfluoroalkly substances (PFAS)		
PFOA	10ng/L	Confirmed detection
PFOS	15ng/L	Confirmed detection
PFHxS	65ng/L	Confirmed detection
PFNA	9ng/L	Confirmed detection
PFBS	345ng/L	Confirmed detection

Below is the proposed draft for Table 9. Proposed removed items are in strikethrough and newly proposed items are underlined.

DRAFT TABLE 9

State Action Levels		
Contaminant or Group of Contaminants:	SAL	SAL Exceedance Based On:
Per- and polyfluoroalkyl substances (PFAS)		
PFOA	10 <u>4.0</u> ng/L	Confirmed Detection <u>Running annual average</u>
PFOS	15 <u>4.0</u> ng/L	Confirmed Detection <u>Running annual average</u>
PFHxS	65 <u>10</u> ng/L	Confirmed Detection <u>Running annual average</u>
PFNA	9 <u>10</u> ng/L	Confirmed Detection <u>Running annual average</u>
<u>HFPO-DA</u>	<u>10</u> ng/L	Confirmed Detection <u>Running annual average</u>
<u>Hazard Index PFAS (HFPO-</u>		

**DA, PFBS, PFHxS, and
PFNA)¹**

1 (unitless)¹

Running annual average

¹ The PFAS Mixture Hazard Index (HI) is the sum of component hazard quotients (HQs), which are calculated by dividing the measured component PFAS concentration in water by the relevant health-based water concentration when expressed in the same units (shown in ng/l for simplification). The HBWC for PFHxS is 10 ng/l; the HBWC for HFPO-DA is 10 ng/l; the HBWC for PFNA is 10 ng/l; and the HBWC for PFBS is 2000 ng/l.

Hazard Index = ([HFPO-DAwater ng/l]/[10 ng/l]) + ([PFBSwater ng/l]/[2000 ng/l]) + ([PFNAwater ng/l]/[10 ng/l]) + ([PFHxSwater ng/l]/[10 ng/l])

HBWC = health-based water concentration

HQ = hazard quotient

ng/l = nanograms per liter

PFASwater = the concentration of a specific PFAS in water

**WAC 246-290-71006 Public notice for contaminants with a SAL and other
unregulated contaminants**

Below is the current Table 17.

CURRENT TABLE 17

PUBLIC NOTICE TIER DESIGNATION FOR CONTAMINANTS WITH A SAL		
Contaminant or Group of Contaminants	Public Notice Tier	Bioaccumulative
PFOA	Tier 2	Yes
PFOS	Tier 2	Yes
PFHxS	Tier 2	Yes
PFNA	Tier 2	Yes
PFBS	Tier 2	Yes

**Below is the proposed draft for Table 17. Proposed removed items are in
strikethrough and newly proposed items are underlined.**

DRAFT TABLE 17

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PUBLIC NOTICE TIER DESIGNATION FOR CONTAMINANTS WITH A SAL

Contaminant or Group of Contaminants	Public Notice Tier	((Bioaccumulative)) SAL Exceedance Based on:
PFOA	Tier 2	((Yes)) <u>Running annual average</u>
PFOS	Tier 2	((Yes)) <u>Running annual average</u>
PFHxS	Tier 2	((Yes)) <u>Running annual average</u>
PFNA	Tier 2	((Yes)) <u>Running annual average</u>
PFBS	Tier 2	((Yes)) <u>Running annual average</u>
<u>HFPO-DA PFBS, PFHxS, and PFNA</u>	Tier 2	<u>Running annual average</u>

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QUESTION 3

Referring to the proposed changes in Table 9, what is the estimated impact of reducing the SAL for PFOA from 10ng/L to 4.0ng/L ([Click here to view Table 9](#))

Increased cost?

One-time or Initial
cost: \$

Annual recurrent cost:
\$

Cost savings?

One-time or Initial
savings: \$

Annual recurrent
savings: \$

If there are no additional costs or savings listed above, what is the reason?

- ☐ The impact is cost-neutral (\$0) or insignificant - no additional costs or savings
- ☐ This question does not apply to my operation

* Comments

Please include an explanation of the costs listed above, benefits of this rule change, and/or any ideas for offsetting costs, if there were increased costs. If no additional costs or if this question does not apply to your operation, please enter NA.

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QUESTION 4

Referring to the proposed changes in table 9, what is the estimated impact of changing the PFOA exceedance from a confirmed detection to a running annual average? ([Click here to view Table 9](#))

Increased cost?

One time or initial cost: \$

Annual recurrent cost: \$

Cost savings?

One-time or Initial savings: \$

Annual recurrent savings: \$

If there are no additional costs or savings listed above, what is the reason?

- ☐ The impact is cost-neutral (\$0) or insignificant - no additional costs or savings
- ☐ This question does not apply to my operation

*** Comments**

Please include an explanation of the costs listed above, benefits of this rule change, and/or any ideas for offsetting costs, if there were increased costs. If no additional costs or if this question does not apply to your operation, please enter NA.

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QUESTION 5

Referring to the proposed changes in Table 9, what is the estimated impact of reducing the SAL for PFOS from 10 to 4.0 ng/L? ([Click here to view Table 9](#))

Increased cost?

One-time or Initial
cost: \$

Annual recurrent cost:
\$

Cost savings?

One-time or Initial
savings: \$

Annual recurrent
savings: \$

If there are no additional costs or savings listed above, what is the reason?

- ☐ The impact is cost neutral (\$0) or insignificant - no additional costs or savings
- ☐ This question does not apply to my operation

*** Comments**

Please include an explanation of the costs listed above, the benefits of this rule change and/or any ideas for offsetting costs if increased costs were indicated. If no additional costs or if this question does not apply to your operation, please enter NA.

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QUESTION 6

Referring to the proposed changes in table 9, what is the estimated impact of changing the PFOS exceedance from a confirmed detection to a running annual average?" ([Click here to view Table 9](#))

Increased cost?

One-time or initial cost: \$

Annual recurrent cost: \$

Cost savings?

One-time or Initial savings: \$

Annual recurrent savings: \$

If there are no additional costs or savings listed above, what is the reason?

- ☐ Impact is cost neutral (\$0) or insignificant - no additional costs or savings
- ☐ This question does not apply to my operation

*** Comments**

Please include an explanation of the costs listed above, the benefits of this rule change and/or any ideas for offsetting costs if increased costs were indicated. If no additional costs or if this question does not apply to your operation, please enter NA.

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QUESTION 7

Referring to the proposed changes in Table 9, what is the estimated impact of reducing the SAL for PFHxS from 65 to 10 ng/L? [\(Click here to view Table 9\)](#)

Increased cost?

One-time or Initial
cost: \$

Annual recurrent cost:
\$

Cost savings?

One-time or Initial
savings: \$

Annual recurrent
savings: \$

If there are no additional costs or savings listed above, what is the reason?

- ☐ Impact is cost neutral (\$0) or insignificant - no additional costs or savings
- ☐ This question does not apply to my operation

*** Comments**

Please include an explanation of the costs listed above, benefits of this rule change, and/or any ideas for offsetting costs, if there were increased costs. If no additional costs or if this question does not apply to your operation, please enter NA.

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QUESTION 8

Referring to the proposed changes in table 9, what is the estimated impact of changing the PFHxS exceedance from a confirmed detection to a running annual average? ([Click here to view Table 9](#))

Increased cost?

One-time or initial cost: \$

Annual recurrent cost: \$

Cost savings?

One-time or Initial savings: \$

Annual recurrent savings: \$

If there are no additional costs or savings listed above, what is the reason?

- ☐ Impact is cost neutral (\$0) or insignificant – no additional costs or savings
- ☐ This question does not apply to my operation

*** Comments**

Please include an explanation of the costs listed above, benefits of this rule change, and/or any ideas for offsetting costs, if there were increased costs. If no additional costs or if this question does not apply to your operation, please enter NA.

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QUESTION 9

Referring to the proposed changes in Table 9, what is the estimated impact of increasing the SAL for PFNA from 9 to 10 ng/L? ([Click here to view Table 9](#))

Increased cost?

One-time or Initial
cost: \$

Annual recurrent cost:
\$

Cost savings?

One-time or Initial
savings: \$

Annual recurrent
savings: \$

If there are no additional costs or savings listed above, what is the reason?

- ☐ Impact is cost neutral (\$0) or insignificant - no additional costs or savings
- ☐ This question does not apply to my operation

*** Comments**

Please include an explanation of the costs listed above, benefits of this rule change, and/or any ideas for offsetting costs, if there were increased costs. If no additional costs or if this question does not apply to your operation, please enter NA.

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QUESTION 10

Referring to the proposed changes in table 9, what is the estimated impact of changing the PFNA exceedance from a confirmed detection to a running annual average? ([Click here to view Table 9](#))

Increased cost?

One-time or Initial
cost: \$

Annual recurrent cost:
\$

Cost savings?

One-time or Initial
savings: \$

Annual recurrent
savings: \$

If there are no additional costs or savings listed above, what is the reason?

- ☐ Impact is cost neutral (\$0) or insignificant – no additional costs or savings
- ☐ This question does not apply to my operation

*** Comments**

Please include an explanation of the costs/savings listed above, benefits of this rule change, and/or any ideas for offsetting costs, if there were increased costs. If no additional costs or if this question does not apply to your operation, please enter NA.

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QUESTION 11

Referring to the proposed changes in Table 9, what is the estimated impact of removing PFBS as an individual SAL, and grouping it into the Hazard Index? ([Click here to view Table 9](#))

Increased cost?

One-time or Initial
cost: \$

Annual recurrent cost:
\$

Cost savings?

One-time or Initial
savings: \$

Annual recurrent
savings: \$

If there are no additional costs or savings listed above, what is the reason?

- ☐ Impact is cost neutral (\$0) or insignificant – no additional costs or savings
- ☐ This question does not apply to my operation

*** Comments**

Please include an explanation of the costs listed above, benefits of this rule change, and/or any ideas for offsetting costs, if there were increased costs. If no additional costs or if this question does not apply to your operation, please enter NA.

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QUESTION 12

Referring to proposed changes in Table 17, what is the estimated impact of removing Tier 2 notification for PFBS individually? [\(Click here to view Table 17\)](#)

Increased cost?

One-time or Initial
cost: \$

Annual recurrent cost:
\$

Cost savings?

One-time or Initial
savings: \$

Annual recurrent
savings: \$

If there are no additional costs or savings listed above, what is the reason?

- ☐ Impact is cost neutral (\$0) or insignificant - no additional costs or savings
- ☐ This question does not apply to my operation

*** Comments**

Please include an explanation of the costs listed above, benefits of this rule change, and/or any ideas for offsetting costs, if there were increased costs. If no additional costs or if this question does not apply to your operation, please enter NA.

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QUESTION 13

Referring to proposed changes in Table 9, what is the estimated impact of adding a SAL for HFPO-DA of 10 ng/L? ([Click here to view Table 9](#))

Increased cost?

One-time or Initial
cost: \$

Annual recurrent cost:
\$

Cost savings?

One-time or Initial
savings: \$

Annual recurrent
savings: \$

If there are no additional costs or savings listed above, what is the reason?

- ☐ Impact is cost neutral (\$0) or insignificant - no additional costs or savings
- ☐ This question does not apply to my operation

*** Comments**

Please include an explanation of the costs listed above, benefits of this rule change, and/or any ideas for offsetting costs, if there were increased costs. If no additional costs or if this question does not apply to your operation, please enter NA.

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QUESTION 14

Referring to proposed changes in Table 17, what is the estimated impact of requiring Tier 2 notification for HFPO-DA? [\(Click here to view Table 17\)](#)

Increased cost?

One-time or Initial
cost: \$

Annual recurrent cost:
\$

Cost savings?

One-time or Initial
savings: \$

Annual recurrent
savings: \$

If there are no additional costs or savings listed above, what is the reason?

- ☐ Impact is cost neutral (\$0) or insignificant - no additional costs or savings
- ☐ This question does not apply to my operation

*** Comments**

Please include an explanation of the costs listed above, benefits of this rule change, and/or any ideas for offsetting costs, if there were increased costs. If no additional costs or if this question does not apply to your operation, please enter NA.

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QUESTION 15

Referring to proposed changes in Table 9, what is the estimated impact of adding a SAL for the Hazard Index? ([Click here to view Table 9](#))

Increased cost?

One-time or Initial
cost: \$

Annual recurrent cost:
\$

Cost savings?

One-time or Initial
savings: \$

Annual recurrent
savings: \$

If there are no additional costs or savings listed above, what is the reason?

- ☐ Impact is cost neutral (\$0) or insignificant - no additional costs or savings
- ☐ This question does not apply to my operation

*** Comments**

Please include an explanation of the costs listed above, benefits of this rule change, and/or any ideas for offsetting costs, if there were increased costs. If no additional costs or if this question does not apply to your operation, please enter NA.

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QUESTION 16

Referring to proposed changes Table 17, what is the estimated impact of requiring Tier 2 notification for the Hazard Index? ([Click here to view Table 17](#))

Increased cost?

One-time or Initial
cost: \$

Annual recurrent cost:
\$

Cost savings?

One-time or Initial
savings: \$

Annual recurrent
savings: \$

If there are no additional costs or savings listed above, what is the reason?

- ☐ Impact is cost neutral (\$0) or insignificant - no additional costs or savings
- ☐ This question does not apply to my operation

*** Comments**

Please include an explanation of the costs listed above, benefits of this rule change, and/or any ideas for offsetting costs, if there were increased costs. If no additional costs or if this question does not apply to your operation, please enter NA.

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QUESTION 17

What did we miss?

If there are costs for items in the draft rule language, not covered in this survey, please provide the WAC section (example, WAC 246-282-006), a brief summary of the language change, and associated costs.

WAC Section:

Brief summary of the
language change:

Increased Cost?

One-time or Initial
cost: \$

Annual recurrent cost:
\$

Cost Savings?

One-time or Initial
savings: \$

Annual recurrent
savings: \$

Comments:

Please add any further explanation of costs or savings.

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THIS IS THE LAST PAGE OF THE SURVEY

Thank you for your participation.

Please click **DONE** (below) to submit your responses.