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Making Sound PFAS Treatment Decisions

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For a Massachusetts water utility, deciding how to treat PFAS in drinking water should be more than an exercise in comparing construction estimates. The decision should bring together water quality, dependable supply, long-term operating costs, and the burden on customers. The right question is not simply, "Which project costs less?" It is, "Which investment will deliver the treatment and capacity this community needs, at a sustainable cost?"

A recent proposal in Chatham illustrates the choices. According to an October 28 report in The Cape Cod Chronicle, officials considered two approaches for treating PFAS at a pair of municipal wells: a roughly $16.2 million plant that would also treat iron and manganese and allow year-round operation, or approximately $2.5 million in outdoor granular activated carbon treatment equipment for peak summer use. The less expensive option would require one or both wells to shut down during the off-season and would not treat iron and manganese. Officials favored developing a town-meeting funding request for that option.

That is not evidence that every utility should choose a seasonal installation, or that the more expensive alternative is unnecessary. It is a reminder that treatment decisions need to be evaluated against the demands of the particular water system. Four considerations should guide that analysis.

First, start with the treatment objective, not the equipment. A utility should first define what the project must accomplish: which contaminants it needs to address, what finished-water performance it expects, and how that performance will be verified. The evaluation should consider the characteristics of the source water and whether other constituents must also be treated. A proposal that addresses one problem should not be assumed to resolve every water-quality issue at the same source.

The utility should also explain what will happen if results fall short. What monitoring will demonstrate that treatment is working? What result would trigger a change in operations? Who will act, and how will customers be informed? Those questions should be answered before construction, not left for the first difficult operating decision. Treatment



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performance should be presented as an ongoing responsibility rather than a milestone achieved when equipment is installed.

Second, match the project to actual supply needs. The question is how much usable water the system needs, and when. A treatment installation designed for summer demand may be a sensible fit if other sources can reliably serve customers throughout the rest of the year. It may be less attractive if the utility needs those wells during maintenance, an equipment failure, or a prolonged dry period. The analysis should compare normal operations with plausible stress conditions, not merely assume that each source will always be available on schedule.

Chatham makes that distinction concrete. The Town's consultant described the two wells as integral to meeting summer demand, while saying other wells provide adequate capacity during the rest of the year. The consultant also said the proposed treatment vessels could be repurposed within a new building if additional treatment became necessary. Those details help explain the proposed approach, but another community would need to establish its own supply assumptions and expansion options.

Third, compare lifecycle costs, not just capital costs. A construction estimate is the beginning of the financial analysis. Decision-makers should also examine staffing, energy, sampling, maintenance, replacement treatment media, and the management of spent media or other residuals. They should ask which costs are firmly estimated, which depend on assumptions, and how sensitive the comparison is to changes in operating conditions. A low initial price should not be mistaken for a low total cost.

The same discipline should apply to future expansion. Can a smaller project be enlarged without discarding useful equipment? Would postponing a larger facility preserve flexibility, or create avoidable duplication? Neither option is automatically the prudent choice. The utility should make the tradeoff visible, including what customers gain and what operating flexibility they give up.

Fourth, explain who pays and what remains unfunded. Settlement proceeds, grants, borrowing, and customer charges should be shown separately. Chatham's public works director reported that $1.1 million in PFAS settlement funds could be available for the proposed project. Such funding can help with an investment, but decision-makers should distinguish a possible contribution from an approved allocation and identify the costs that remain.

Customers deserve a clear explanation of both the financing plan and the recurring obligations. If outside funds support construction, how will ongoing treatment be paid for? What happens if costs exceed estimates? How will the utility address affordability while maintaining dependable service? Public confidence is better served by acknowledging those questions than by presenting a capital appropriation as the entire price of the solution.

PFAS treatment decisions should ultimately be judged by performance over time: dependable water quality, sufficient supply, manageable costs, and a credible plan for changing conditions. Chatham offers a useful example, not a universal blueprint. For

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Massachusetts utilities, the strongest investment is the one whose technical, operational, and financial assumptions can be explained clearly and tested honestly. Each situation we encounter is fact-specific. Therefore, it is always advisable to consult with counsel to ensure that you are taking the appropriate steps and making the best decisions possible for you.

If you have any questions on this topic or wish to explore it more, please contact us.

Disclaimer: This summary is provided for educational and informational purposes only and is not legal advice. Any specific questions about these topics should be directed to attorney(s) Joseph Dorfler and/or Eric Krathwohl.

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