

# New Hampshire has poured \$223 million into its PFAS problem. The capital bill is still climbing.

PFAS has rewritten the drinking-water agenda in New Hampshire — from the Saint-Gobain plume in Merrimack to roughly 200 systems now facing treatment. Add lead-line replacement, aging mains, and a federal standard that keeps moving, and the project list you approved last year may already be wrong. Invizion helps New Hampshire utilities re-sequence a capital portfolio in a click — and defend every decision.

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| <b>\$223M<sup>1</sup></b>                                                                                              | <b>~200<sup>2</sup></b>                                                                                             | <b>\$43M+<sup>3</sup></b>                                                                                             | <b>5,800 ppt<sup>4</sup></b>                                                                                      |
| State and federal dollars New Hampshire has put into PFAS response over seven years — and the spending isn't finished. | NH public water systems that must install PFAS treatment — roughly <i>triple</i> the number that had to act before. | PFAS drinking-water settlement dollars secured for New Hampshire so far, with payments running through at least 2033. | PFOA measured in groundwater at the Saint-Gobain Merrimack plant in 2016 — 58× the state's threshold at the time. |



## THE NEW HAMPSHIRE LANDSCAPE

# Four forces are moving your project list at once

None of these is theoretical, and none of them waits for your next budget cycle. Together they mean the capital plan you approved last year may already be the wrong plan.

### CONTAMINATION — PFAS

#### PFAS is the defining pressure on New Hampshire water

In 2016, Saint-Gobain Performance Plastics told the state it had found PFAS in the public water supply near its Merrimack facility; groundwater at the plant tested at 5,800 parts per trillion of PFOA, 58 times the state's threshold at the time<sup>4</sup>. The company is now providing some residents with safe drinking water indefinitely, and state investigators have documented elevated kidney-cancer rates in Merrimack and Manchester<sup>5</sup>.

The problem is statewide, not just Merrimack. About 30% of public water supplies have tested positive for some level of PFAS and roughly 7% have exceeded standards, while about 56% of the ~12,000 private wells tested exceeded EPA limits<sup>1</sup>. Roughly 200 systems now have to install treatment — about triple the prior number.<sup>2</sup>

### COMPLIANCE — LEAD

#### The lead-line clock is running in the mill cities

The federal Lead and Copper Rule Improvements, finalized October 8, 2024, require water systems to identify and replace lead service lines within roughly ten years, on top of tighter testing and a lower action level<sup>6</sup>.

In older systems — the mill-era neighborhoods of Manchester, Nashua, and other legacy cities — every “unknown” on the inventory is a potential replacement, and replacement is capital. That obligation lands on the same balance sheet already carrying PFAS treatment.

## RENEWAL — SMALL & AGING SYSTEMS

### Hundreds of small systems, one shared backlog

New Hampshire's water sector is fragmented: a handful of large municipal and regional providers surrounded by hundreds of small community systems, precincts, and village districts, many without the rate base or staff to absorb a major capital program.

The renewal need doesn't go away because a mandate arrived. EPA's most recent national needs survey puts the 20-year drinking-water infrastructure need at \$625 billion, and New Hampshire's aging mains, tanks, and treatment plants are part of it.<sup>7</sup> Compliance capital stacks on top of renewal — it doesn't replace it.

## TIMING — A MOVING TARGET

### The compliance standard keeps shifting

New Hampshire set its own PFAS maximum contaminant levels in 2019 — PFOA 12 ppt, PFOS 15 ppt, PFHxS 18 ppt, PFNA 11 ppt.<sup>8</sup> EPA's 2024 federal rule went lower still, to 4 ppt for PFOA and PFOS.<sup>9</sup>

Then the target moved: EPA has signaled it will rescind limits on four of the six regulated PFAS and asked states to delay adoption, so New Hampshire has rules "done and ready to go" but is holding until the federal picture settles.<sup>2</sup> For a CFO, that's the hard part: sizing and timing treatment capital against a number that isn't final.

WHO RUNS NEW HAMPSHIRE’S WATER

Mostly municipal — plus a Nashua-owned regional utility and a shrinking set of private systems

New Hampshire’s larger systems are municipal or municipally owned; Pennichuck is owned outright by the City of Nashua yet still rate-regulated. The remaining investor-owned systems are consolidating — Aquarion’s NH operations have moved to Unitil. The pressures are shared; the accountability path differs.

Municipal & public utilities

Rates set by city government or by the PUC for regulated systems

**Pennichuck (owned by City of Nashua)** ~110,000 served · expanded to ~30 communities in 2025<sup>10</sup>

**Manchester Water Works** Municipal · sourced from Lake Massabesic<sup>11</sup>

**City of Portsmouth Water** Seacoast municipal supplier (Pease PFAS history)

**Merrimack Village District** At the center of the Saint-Gobain response

**Concord, Derry, Salem, Keene** Other large municipal systems

Pennichuck ceased to be publicly traded in January 2012 when Nashua became its sole shareholder; a March 2025 merger widened its footprint across southern and central New Hampshire.<sup>10</sup>

Investor-owned & regulated systems

Rates & capital recovery overseen by the NH PUC

**Unitil (former Aquarion NH operations)** Bought Aquarion’s NH water business & Abenaki Water Co.<sup>12</sup>

**Pennichuck East & Pittsfield Aqueduct** Former Pennichuck subsidiaries, merged into Pennichuck Water Works in 2025; PUC-regulated

**Numerous small & rural systems** Precincts, village districts — where funding gaps hit hardest

Aquarion’s parent has been unwound: the Connecticut system is now a public water authority, and its New Hampshire operations were sold to Unitil.<sup>12</sup>

## Every capital dollar has to be defensible

Whether you answer to the Public Utilities Commission or a city council, the question is the same: why this project, why now, why at this cost? New Hampshire's oversight is asking it harder than ever — against a compliance standard that keeps moving.

**NH Public Utilities Commission (PUC)** regulates rates and capital recovery for investor-owned and other regulated water utilities — including the former Aquarion NH systems now under Unitil and Pennichuck's regulated subsidiaries<sup>13</sup>

**NH Department of Environmental Services (DES)** holds Safe Drinking Water Act primacy and set the state's 2019 PFAS MCLs; it now administers federal PFAS standards under an interim EPA agreement while its own updated rules wait on Washington<sup>12</sup>

**Lead & Copper Rule Improvements** require service-line inventories and a roughly ten-year replacement program — and the compliance capital that follows<sup>14</sup>

**City councils & commissioners** approve municipal capital plans — Manchester, Portsmouth, Concord and others — in public, in front of ratepayers.

## The money is moving — can your plan absorb it?

New Hampshire has assembled more PFAS and water funding than at any point in its history — more than \$223 million in state and federal dollars over seven years.<sup>1</sup> The constraint is no longer only dollars — it's readiness: which projects qualify, which are shovel-ready, and how the timing lines up with everything else on the list.

**~\$85.67M from the Bipartisan Infrastructure Law** has flowed to NH DES for PFAS response, alongside about \$26M from the American Rescue Plan Act.<sup>1</sup>

**\$43M+ in PFAS settlements** — from national settlements with 3M, DuPont, Tyco, and BASF (including \$7.3M most recently from 3M) — flowing to the NH Drinking Water & Groundwater Trust Fund, with payments running through at least 2033<sup>3</sup>

**\$106M appropriated by the Legislature since 2019** including about \$97.7M for drinking-water remediation, plus roughly \$5M from the state Drinking Water & Groundwater Trust Fund<sup>1</sup>

**Drinking Water & Clean Water State Revolving Funds** administered by NH DES, provide low-interest loans and principal forgiveness — the standing federal-state channel that carries much of this capital.

## NEW HAMPSHIRE WATER, IN BRIEF

## Questions New Hampshire utility leaders are asking

Short, sourced answers — the same facts we'll dig into on a call, in the context of your system.

### What are New Hampshire's PFAS drinking-water limits?

New Hampshire set its own maximum contaminant levels in 2019: PFOA 12 ppt, PFOS 15 ppt, PFHxS 18 ppt, and PFNA 11 ppt. EPA's 2024 federal rule set stricter limits — 4 ppt for PFOA and PFOS — but the federal standard is now in flux, with EPA moving to rescind limits on four of the six compounds and asking states to delay adoption.<sup>92</sup>

### What happened with Saint-Gobain in Merrimack?

In 2016, Saint-Gobain reported PFAS in the public water supply near its Merrimack plastics plant; groundwater at the site measured 5,800 ppt of PFOA, 58 times the state's threshold at the time.<sup>4</sup> The company is now supplying some affected residents with safe drinking water indefinitely, and the state has linked the plume to elevated kidney-cancer rates in Merrimack and Manchester.<sup>5</sup>

### How many New Hampshire systems have to treat for PFAS, and who pays?

Roughly 200 public water systems must install PFAS treatment — about triple the prior number.<sup>2</sup> The state has committed more than \$223 million to PFAS response over seven years, drawing on federal infrastructure and rescue-plan dollars, legislative appropriations, and manufacturer settlements — but the funding rarely arrives on the same schedule as the mandate.<sup>1</sup>

### Who sets my utility's rates in New Hampshire?

The NH Public Utilities Commission regulates rates for investor-owned and other regulated water utilities — including the former Aquarion NH systems now under Unitil and Pennichuck's regulated subsidiaries.<sup>13</sup> Pure municipal systems such as Manchester and Portsmouth set rates through their own city government. Either way, capital spending has to be justified to a governing body and, increasingly, to ratepayers.

### What funding is available to New Hampshire water utilities?

About \$85.67 million in Bipartisan Infrastructure Law funds and \$26 million in ARPA money have gone to PFAS response; more than \$43 million in manufacturer settlements is flowing through the state trust fund with payments through at least 2033; and the Legislature has appropriated \$106 million since 2019.<sup>13</sup> The Drinking Water and Clean Water State Revolving Funds add low-interest loans and principal forgiveness on top.<sup>14</sup>

### How does Invizion help New Hampshire water utilities plan capital?

Invizion is scenario-based capital portfolio optimization for water utilities. It lets you model how a shifting PFAS standard, a settlement or SRF award, or a lead-line deadline reshuffles your whole project list, re-sequence the portfolio automatically, and keep a defensible record of every trade-off for the PUC, your council, or ratepayers. The best next step is a short first meeting to look at it against your own program.

## REFERENCES

## Sources

Every figure in this briefing is tied to a primary or authoritative source.

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2. New Hampshire Public Radio, "With national PFAS standards in flux, New Hampshire regulators try to move forward" — ~200 systems must install treatment (about triple), NH set 2019 limits, EPA rollback of four of six PFAS and requested delay, NH rules "done and ready," April 2026. [nhpr.org](https://www.nhpr.org)
3. New Hampshire Public Radio, "NH gets another \$7 million from PFAS drinking water settlements" — \$43M+ to date, \$7.3M from 3M, four national settlements (3M, DuPont, Tyco, BASF), payments through at least 2033, funds to NH Drinking Water & Groundwater Trust Fund, August 2026. [nhpr.org](https://www.nhpr.org)
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6. U.S. EPA, "Lead and Copper Rule Improvements" — final rule October 8, 2024 requiring identification and replacement of lead service lines within ~10 years, tighter testing, lower action level. [epa.gov](https://www.epa.gov)
7. U.S. EPA, "7th Drinking Water Infrastructure Needs Survey and Assessment" — \$625 billion national 20-year drinking-water infrastructure need, 2023. [epa.gov](https://www.epa.gov)
8. NH Department of Environmental Services, PFAS drinking-water MCLs (Env-Dw 700, adopted 2019, effective 2020): PFOA 12 ppt, PFOS 15 ppt, PFHxS 18 ppt, PFNA 11 ppt. [des.nh.gov](https://des.nh.gov)
9. U.S. EPA, "Per- and Polyfluoroalkyl Substances (PFAS) — Final PFAS National Primary Drinking Water Regulation" — 4 ppt MCLs for PFOA and PFOS (10 ppt for PFHxS, PFNA, HFPO-DA), Hazard Index of 1, April 2024. [epa.gov](https://www.epa.gov)
10. Pennichuck Corporation, "About Us" — City of Nashua sole shareholder since January 25, 2012; ~110,000 people served (~10% of NH) across Nashua and surrounding towns; March 1, 2025 merger expanded to ~30 communities across southern and central New Hampshire. [pennichuck.com](https://pennichuck.com)
11. Manchester Water Works, City of Manchester, NH — municipal drinking-water utility sourced from Lake Massabesic. [manchesternh.gov](https://manchesternh.gov)
12. Aquarion Water — the Connecticut system now operates as a public water authority serving 735,000 in 60 municipalities, and Unifil purchased Aquarion's New Hampshire water operations (Aquarion Water Company of NH and Abenaki Water Company). [aquarionwater.com](https://aquarionwater.com)
13. New Hampshire Public Utilities Commission — regulates rates and capital recovery for investor-owned and other regulated water utilities in New Hampshire. [puc.nh.gov](https://puc.nh.gov)
14. NH Department of Environmental Services — Drinking Water and Clean Water State Revolving Funds (low-interest loans and principal forgiveness). [des.nh.gov](https://des.nh.gov)

## ABOUT INVIZION

## Capital program optimization for utilities

Invizion is a purpose-built capital lifecycle management platform for water and wastewater utilities. It integrates budgeting, CIP, scenario analysis, and funding-source tracking in one system — so utilities can re-sequence a capital portfolio in a click and demonstrate audit-ready, defensible decisions to regulators, boards, and rating agencies.

**See what a defensible New Hampshire capital plan looks like — book a 20-minute first meeting.**

**Book your first meeting →**