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Dear Ms. Paula Wilson,

IDEXX commends the Idaho Department of Environmental Quality (Department), on the proposed changes to the Water Quality Standards, specifically by including enterococci as an additional bacterial indicator of fecal contamination. We appreciate the opportunity to participate in the public comment period and at this time, IDEXX would like to request the Department to consider the following comment.

Recommend editing the units associated with the bacteria indicators, found in Section 251.02, from “colony forming units (CFU) per one hundred (100) ml” to “counts per 100 mL.”

Rational for suggested edit: The unit describes the method the laboratory uses for bacterial detection, for example the test result would be assigned either as most probable number (MPN) per 100mL or colony forming units (CFU) per 100mL, depending on which approved test method was used [1]. CFU and MPN are both estimates for the concentration of viable target bacteria within a water sample and the US EPA approves the use of different analytical methods, with results expressed in either units [2]. To enter an MPN value in a column labelled “CFU” would be using the incorrect unit.

This editorial change would help ensure the water quality regulations are inclusive to all EPA approved methods for bacteria detection. We appreciate the opportunity to provide these comments and look forward to the next steps of the Triennial Review of Idaho Water Quality Standards.

Respectfully submitted,



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References

1. Gronewold AD, Wolpert RL. 2008. Modeling the relationship between most probable number (MPN) and colony-forming unit (CFU) estimates of fecal coliform concentration. *Water Res.* 42(13):3327-3334
2. US Environmental Protection Agency, 40 CFR Part 136. Guidelines Establishing Test Procedures for the Analysis of Pollutants. 1977