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The present primary contact recreational bacteria limits of 100 cfu/100mL (as GMV) and 200 cfu/100mL (as STV) for fecal coliform are already more stringent than the 100 cfu/100mL and 320 cfu/100mL proposed limits for E. coli. E. coli are a subset of fecal coliform, so their actual number in a sample automatically would be less than the proposed limits. You did not mention this, but this fact was one of the major reasons that fecal coliform was kept as the bacteria of choice when looked at by the 1996 workgroup, instead of converting to E. coli.

If the State now converts to 100/320 cfu/100mL then it would be "backsliding" on its prior water quality standard of 100/200 cfu/100mL. Especially in light of the fact that the fecal coliform test identifies not only E. coli, but several other bacteria species.

Seems like a shame to want to provide "less" protection for the primary recreational citizen just because EPA wants you to do it.