



Ms. Susan Braley,  
Water Quality Program  
Washington State Department of Ecology  
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April 23, 2020

**Document: Water Quality Policy 1-11, Chapter 1: Assessment of Water Quality for the Clean Water Act  
Sections 303 (d) and 305 (b)**

Dear Ms. Susan Braley,

IDEXX appreciates the opportunity from the Washington Department of Ecology (Department) to submit our input on the draft revisions to the Water Quality Policy 1-11, Chapter 1. At this time, IDEXX would like to request the Department to consider the following comment.

1. Change references of “CFU” to “organisms” as stated within the following paragraphs:
  - a. Page 34, paragraph 3, last sentence, currently written as: “When the detection limit is not available, a value of 2 CFU/100mL will be assigned”

Suggest revising to: “When the detection limit is not available, a value of 2 organisms per 100mL will be assigned”

- b. Page 40, paragraph 1, last sentence, currently written as: “When the detection limit is not available, a value of 2 CFU/100mL will be assigned.”

Suggest revising to: “When the detection limit is not available, a value of 2 organisms per 100mL will be assigned.”

Rational: All other references to units of measure written within the draft policy are stated as “organisms per 100mL.” Additionally, the label or unit describes the method the lab uses for bacterial detection, for example the test result would be assigned either as most probable number (MPN) per 100 mL or CFU per 100 mL depending on what test method was used [1]. The US EPA approves the use of the different analyses, which results are either expressed as MPN or CFU units [2]. To enter an MPN value in a column called “CFU” would be using the incorrect unit. CFU and MPN are both estimates for the concentration of viable target bacteria within a water sample.

IDEXX appreciates the opportunity to provide this comment and looks forward to the next steps for the finalization of the Water Quality Policy 1-11, Chapter 1.

Respectfully submitted,

A handwritten signature in blue ink that reads "Jody Frymire".

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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. (1977). 40 CFR Part 136. Guidelines Establishing Test Procedures for the Analysis of Pollutants.