



Paula Wilson
Idaho Department of Environmental Quality
1410 N. Hilton, Boise, ID 83706

May 19, 2020

Document Docket Number: 58-0125-2001, Negotiated Rule Draft No. 2

Dear Ms. Paula Wilson,

IDEXX appreciates the opportunity from the Idaho Department of Environmental Quality (Department) to submit our input on the Rules Regulating the Idaho Pollutant Discharge Elimination System (IPDES) Program, IDAPA 58.01.25: Docket No. 58-0125-2001. IDEXX would also like to thank you for considering our last comment on this regulation. At this time, IDEXX would like to request the Department to consider the following comment.

Suggest revising the reference of fecal coliform from “fecal coliform (including *E. coli*)” to “fecal coliform or *E. coli*” or “*E. coli* (previously known as fecal coliform).”

Rational: To clarify drafted regulation language to verify if testing for only *E. coli* is acceptable, since *E. coli* are a better indicator for fecal contamination versus fecal coliform, thus more protective to human health.

While the revised drafted language of “fecal coliform (including *E. coli*)” indicates that *E. coli* are included in the fecal coliform bacteria group, it is unclear if the regulation will allow testing for only *E. coli* instead of testing for fecal coliforms. The group of fecal coliforms includes *E. coli*, *Klebsiella*, *Enterobacter*, and *Citrobacter* species [1,2] and when testing for fecal coliforms, the population of the bacteria present can affect the fecal coliform results. For example, *Klebsiella*, *Enterobacter*, and *Citrobacter* species are false-positive indicators of fecal contamination as they are from nonfecal origin [2]. *E. coli* are the only bacteria, of the coliform bacteria group, that come from the intestinal tract, have found to be more specific to the detection of fecal contamination.

If the department will accept *E. coli* only results, in place of testing for fecal coliforms, we suggest revising the draft language for the fecal coliform reference. However, we understand that changing the bacteria requirement, from fecal coliform to *E. coli*, could be beyond the scope of the current proposed changes to the IDAPA 58.01.25, but we hope that the Department will consider this revision to better protect public health. IDEXX appreciates the opportunity to provide this comment and looks forward to the next steps in the rule changing process.

Respectfully submitted,

Jody Frymire | Regulatory Affairs Specialist | IDEXX Water | One IDEXX Drive, Westbrook Maine
|idexx.com/water | Jody-Frymire@idexx.com | (207) 556-4840

References

1. Warden, P., DeSarno, M., Volk, S., & Eldred, B. (2011). Analytical Services. Evaluation of Colilert-18 for Detection and Enumeration of Fecal Coliform Bacteria in Wastewater Using the U.S. Environmental Protection Agency Alternative Test Procedure Protocol. *Microbiological Methods, Journal of AOAC International*. Volume 94, Number 5
2. Doyle, M., & Erickson, M. (2006). Closing the Door on the Fecal Coliform Assay. *Microbe*, Volume 1, Number 4, page 162.