

From:	Stuart Whitford	Sent:	Fri 12/17/2010 3:02 PM
To:	ECY RE SWQS		
Cc:			
Subject:	Triennial Review of Water Quality Standards		

Hello, my name is Stuart Whitford and I'm the Pollution Identification and Correction Program Manager for the Kitsap County Health District. I'm also the Environmental Health Director for Jefferson County.

My primary job for the past 17 years has been to identify and correct sources of fecal contamination in surface waters. The Pollution Identification and Correction Program has been very successful in this regard.

I did want to highlight concerns I've had over the years with Ecology continuing to utilize fecal coliform bacteria as its primary pathogen indicator. I also have concerns about the surface water quality standards for fecal coliform bacteria, for both primary and extraordinary contact.

In regards to using fecal coliform as indicator. We all know from previous epidemiological studies, including the study commissioned by EPA in 1986, that fecal coliform bacteria is a poor human health indicator. In fact, that study determined that E. coli was the best fresh water indicator, and Enterococci was the best marine water indicator. In addition, the IDDEX Collilert and Enterolert methods that have been developed in recent years are significantly cheaper than either MPN or MF fecal coliform testing. We pay \$10.00 per sample for an E coli sample and \$12.40 per sample for an Enterococcus sample. Fecal coliform MPN sample costs us \$15.00 sample. Additionally, results are available much quicker (Collilert is an 18 hour test, and Enterolert is a 24 hour test). So, we would recommend that Ecology switch indicator organisms to achieve better protection of public health and cost savings.

If we are to keep using fecal coliform bacteria as our primary pathogen indicator (which I recommend against) then I would recommend changes to the standards. Specifically, I would recommend the elimination of the Extraordinary Primary Contact Standard for two reasons. One, the experience of our Pollution Identification and Correction Program over the past 17 years has been that our tools, techniques and technologies have generally been insufficient to clean up a stream to meet that standard. Secondly, in Kitsap County, we have two commercial shellfish growing areas located in Primary Contact waterbodies. These include Port Gamble Bay and Dyes Inlet. These shellfish growing areas remain open, even though streams that discharge to them only have to meet the Primary Contact standard. So, does Ecology possess any data that supports the continuing use of the Extraordinary Primary Contact standard? It appears to many of us as the county level that the Primary Contact standard is sufficient to protect beneficial uses in Washington State.

Thanks for consideration.

Should you need any additional clarification, please give me a call at (360) 337-5674, or (360) 385-9411.

Respectfully,

Stuart S. Whitford, R.S.
Pollution Identification and Correction Program Manager, KCHD

Environmental Health Director, JCPH

Stuart S Whitford, R.S.
Pollution Identification & Correction Program Manager
Kitsap County Health District
345 6th Street, Suite 300
Bremerton, WA 98337-1866
(360) 337-5674 (desk)
(360) 337-5235 (office)
(360) 475-9345 (fax)