



Ms. Susanne Meidel  
Water Quality Standards Coordinator  
Maine Department of Environmental Protection  
SHS 17  
Augusta, Maine 04333

**Document: WQS Change Proposal – Triennial Review for 38 M.R.S. § 465, 465-A and 465-B**

March 23, 2020

Dear Ms. Susanne Meidel,

IDEXX appreciates the opportunity, from the State of Maine Department of Environmental Protection (Department), to submit our input on the Maine’s Water Quality Standards undergoing Triennial Review. At this time, IDEXX would like to request the Department to consider the following comment.

Suggest editing all references, within § 465, 465-A, and 465-B, stated as “CFU per 100 milliliters” to be revised to “counts per 100 milliliters.”

The rationale for the suggested edit is that the unit describes the method the laboratory uses for bacterial detection. For example, the test result would be assigned either as the most probable number (MPN) per 100mL or colony forming units (CFU) per 100mL depending on the approved test method that was used [1]. The US EPA approves the use of different analytical test methods with results that are expressed in either 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 [3].

Changing the unit associated to the bacteria count to a general term, such as “counts,” would help ensure the Water Quality Standards within each section § 465, 465-A, and 465-B are being inclusive to all EPA approved methods for bacteria detection. We appreciate the opportunity to provide this comment and look forward to the next steps in the Triennial Review process.

Respectfully submitted,

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

References

1. Gronewold AD, Wolpert RL. 2008. Modeling the relationship between the 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.
3. Sartory D. 2018. MPN and CFU: The Same, Different, or Equivalent? *Waterline* [The Journal of the Water Management Society].