



# WATER ENVIRONMENT ASSOCIATION OF TEXAS

512 E. Riverside Drive, Suite 101 • Austin, Texas 78704 • Phone: 512-693-0060 • Fax: 512-693-0062

September 28, 2005

Water Docket  
Environmental Protection Agency  
Mailcode: 4101T  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

**Re: Docket ID No. OW-2004-0014**

The Water Environment Association of Texas (WEAT) is pleased to provide comments on EPA's proposed rule for *Guidelines Establishing Test Procedures for the Analysis of Pollutants; Analytical Methods for Biological Pollutants in Wastewater and Sewage Sludge*. WEAT is a professional association of engineers, environmental scientists and others who are involved in wastewater treatment and water quality management. We are a member association of the Water Environment Federation and we are dedicated to promoting scientifically sound environmental policy and regulations. Our comments are as follows:

### **Wastewater Analysis:**

- WEAT supports approval of these methods as being in the best interest of the public and regulated community. The use of *E.coli* or *Enterococci* as an indicator of the presence of sewage has been discussed for some time. Studies have shown a closer correlation between the increased incidence of intestinal diseases as the number of *E. coli* and *Enterococci* increase.
- For the regulated community, these methods offer advantages in both time savings for the analyst, and more timely answers for the municipality/utility. The initial cost of setup for the Enterolert and Colilert procedures is more than that for membrane filter procedures and the cost of media is significantly higher. However, we believe that the reduction in man hours, ease of use, reduced chance of contamination due to sample processing, and timeliness of results would tend to offset the cost issues. Also, for those that prefer, the membrane filtration options remain.
- We question whether or not the NPDES program will require (or allow) the alternative use of these procedures for the presently required fecal coliform analysis of wastewater effluents, or does EPA intend to add

additional testing requirements on top of the present fecal coliform requirements? Based on the studies mentioned above, the fecal coliform requirement should be removed because no correlation could be identified between the increase in fecal coliforms (as a group) and a subsequent increase in intestinal disorders.

**Sludge Analysis:**

- Methods 1680 and 1681 suggest the analysis of at least seven samples for Class A sludge. Presently the regulations recommend but do not require the analysis of more than one sample. While statistically the analysis of multiple samples is preferred, we are concerned that the cost of analysis with the MPN procedure may be prohibitive. The cost of the MPN procedure is generally at least five times higher than the membrane filter technique (approved for Class B only) and requires extensive analysis time and incubation capacity.
- Also impacting the cost of analysis is the addition of matrix spike and matrix spike duplicates with each analytical batch as well as daily negative controls, positive controls, media sterility checks and method blanks. While each of these QC components adds to the confidence in the results, they also add significantly to the cost of testing and also to the time required to complete an analytical batch.

We appreciate the opportunity to comment on these proposed rules. If you have any questions, please feel free to contact Ms. Cathy Henderson at 972-331-4312 or me at 512-693-0060 or [carol@weat.org](mailto:carol@weat.org).

Sincerely,

Carol V. Batterton  
Executive Director