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To OW-Docket@EPA

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bcc

Subject Docket ID No. EPA-HQ-OW-2007- 1156

Hello,
Enclosed please find comments.
Thanks,
Manja Blazer

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IDEXX Comments 02-03-2008.doc

Comments for Docket ID No. EPA–HQ–OW–2007–1156, respectfully submitted by Manja Blazer, IDEXX Laboratories, February 3, 2008

IDEXX Laboratories supports and applauds the US EPA for compiling this Draft Cruise Ship Discharge Assessment Report.

Of particular interest to IDEXX is sewage/wastewater and graywater treatment, sampling and testing for fecal indicators on cruise ships. It is our hope that as a result of this cruise study and survey conducted in Alaska that sewage/wastewater and graywater microbiological testing will be established, setting fecal indicators, specifically for *E.coli* and/or *Enterococci*, as well as testing limits and frequency equal to municipal and non-municipal wastewater dischargers.

In order to establish approved testing methods for Cruise Ship sewage/wastewater and gray water monitoring for *E. coli* and/or *Enterococci* fecal indicators, we would encourage EPA to look to the following US EPA approvals:

1. Guidelines Establishing Test Procedures for the Analysis of Pollutants; Analytical Methods for Biological Pollutants in Ambient Water; Final Rule (referenced in this study): <http://www.epa.gov/fedrgstr/EPA-WATER/2003/July/Day-21/w18155.pdf>
2. Guidelines Establishing Test Procedures for the Analysis of Pollutants; Analytical Methods for Biological Pollutants in Wastewater and Sewage Sludge; Final Rule: <http://www.epa.gov/fedrgstr/EPA-WATER/2007/March/Day-26/w1455.pdf>

IDEXX Colilert[®], Colilert-18[®], Enterolert[™], Quanti-Tray[®] and Quanti-Tray[®]/2000 are named as approved methods for enumerating *E. coli* and/or *Enterococci* in both of these US EPA approval guidelines.

We think that meaningful, accurate and rapid methods should be part of cruise ship sewage/wastewater and gray water monitoring for *E. coli* and/or *Enterococci* fecal indicators in order to truly protect public health. Accepting these IDEXX methods as part of the Cruise Ship approved monitoring is supported in the referenced existing Ambient Water and Wastewater Guidelines.

Colilert[®], Colilert-18[®], Enterolert[™] and Quanti-Tray[®] or Quanti-Tray[®]/2000 are manufactured by IDEXX Laboratories and are currently in use by many cruise ships monitoring both sewage/wastewater and graywater for *E. coli* and/or *Enterococci* fecal indicators. In addition, these same IDEXX methods are used for regulated ambient water and wastewater testing in municipal and non-municipal facilities throughout the world. IDEXX methods are simple, easy and rapid tests that will quantify *E.coli* and/or *Enterococci* in both sewage/wastewater and gray water.

Previous IDEXX sent EDOCKET comments on OW-2003-0081 (Identifier OW-2003-0081-0017)

<http://www.epa.gov/EPA-WATER/2004/February/Day-03/w2154.htm>

“IDEXX Laboratories supports and applauds your efforts to survey sewage/wastewater and graywater treatment in large cruise ships operating in Alaska. We look forward to reviewing the results of your survey once it is completed.

It is our hope that as a result of your cruise ship survey water microbiological monitoring will be established setting limits and appropriate indicators (i.e. E.coli, Enterococcus).

We feel that meaningful, accurate and rapid methods should be part of cruise ship water monitoring in order to truly protect public health and the environment.

We have simple, easy and rapid tests that will quantify E.coli and/or Enterococci in both graywater and sewage/wastewater. Colilert[®], Colilert-18[®], Enterolert[™] and Quanti-Tray[®] or Quanti-Tray[®]/2000 are manufactured by IDEXX Laboratories and are currently in use by many cruise ships monitoring both graywater and sewage/wastewater.”

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