



# 54

STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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August 20, 2012

Jeanine Townsend, Clerk to the Board  
California State Water Resources Control Board  
PO Box 100  
Sacramento, CA 95812-0100

**RE: California Policy for Toxicity Assessment and Control**

Dear Ms. Townsend:

Washington State has a well-regarded whole effluent toxicity (WET) program that has run smoothly for twenty years. We are approaching 10,000 WET tests in our database. Our experience with WET test analysis is extensive.

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I have been a supporter of the Test of Significant Toxicity (TST) approach since it was first proposed by R. Shukla (2000) for use in National Pollutant Discharge Elimination System (NPDES) permits for analyzing the results of WET tests. The TST developers used our WET data in demonstrating its utility and benefits. I am very familiar with the TST approach.

Rakesh Shukla, Qin Wang, Florence Fulk, Chunqin Deng, Debra Denton; "Bioequivalence Approach for Whole Effluent Toxicity Testing," *Environmental Toxicology and Chemistry*, January 2000, 19:169-174.

The TST proposal in the draft Policy for Toxicity Assessment and Control will provide a simple method for minimizing both false positive and false negative WET test results. We go through several extra steps to minimize such errors in our WET test results. Assuming appropriately set bioequivalence values and alpha levels, the TST approach represents the best of all possible statistical approaches and will focus resources on genuine occurrences of toxicity.

Thank you for the opportunity to offer comments in support of the SWRCB's toxicity policy.

Sincerely,

Randall Marshall  
WET Coordinator  
Water Quality Program  
Washington State Department of Ecology

