

From: [Latimer, Jim](#)
To: [Clark Freise](#); [Arsenault, Dan](#); [Moraff, Kenneth](#); [Bukhari, Samir](#); [Cobb, Michael](#)
Subject: RE: Latimer Working Responses
Date: Sunday, November 11, 2018 2:30:00 PM

(b) (6)

-----Original Message-----

From: Freise, Clark <Clark.Freise@des.nh.gov>
Sent: Saturday, November 10, 2018 4:38 PM
To: Latimer, Jim <Latimer.Jim@epa.gov>; Arsenault, Dan <Arsenault.Dan@epa.gov>; Moraff, Kenneth <Moraff.Ken@epa.gov>; Bukhari, Samir <Bukhari.Samir@epa.gov>; Cobb, Michael <Cobb.Michael@epa.gov>
Subject: Re: Latimer Working Responses

Jim

(b) (6). I would recommend a different response. Basically, " the ball is in your court to recommend a science based TN limit that can withstand scientific scrutiny and the balance of PS and NPS limits that achieve that limit in the three towns. See you in early December, have a wonderful Thanksgiving, etc. "

On: 10 November 2018 08:34,
"Latimer, Jim" <Latimer.Jim@epa.gov<<mailto:Latimer.Jim@epa.gov>>> wrote:

Dear EPA and DES colleagues,

(b) (6), I will respond to John's questions below and leave it to you to modify as prudent and send them to John.

My responses are in blue below. Feel free to edit or provide additional text to my responses.

Cheers,
Jim

+++++

From: John Hall <jhall@hall-associates.com>
Sent: Friday, November 09, 2018 11:46 AM
To: Clark Freise <clark.freise@des.nh.gov>; Arsenault, Dan <Arsenault.Dan@epa.gov>; Latimer, Jim <Latimer.Jim@epa.gov>
Cc: Moraff, Kenneth <Moraff.Ken@epa.gov>; dean_peschel@yahoo.com; Suzanne M. Woodland <smwoodland@cityofportsmouth.com>; Bukhari, Samir <Bukhari.Samir@epa.gov>; Tom Gallagher <thomas.gallagher@hdrinc.com>
Subject: RE: Latimer Working Responses
Importance: High

Dan/Clark/JIm

This response is most helpful and I think that it provides good path to resolve, at a minimum, the Piscataqua area impacts. It would be most helpful if Jim could provide input on the following questions:

TN loading and form of pollutant

Based on our understanding of what was done, the system TN loads that were plotted to determine area load factors (kg/ha-yr) were basically delivered from groundwater inputs. Nitrate from septic tanks would have been a key

source for the calculated TN loads for the small watersheds evaluated. So while reported as “TN” the component, what was actually being assessed was dissolved (readily bioavailable) nitrogen forms versus potential submerged aquatic vegetation growth. If this is true, then adding particulate TN forms (chunks of plants) and dissolved organic TN (e.g. from decayed plant matter like CDOM) would not be an appropriate comparison of this paper to the GB system, which is dominated from river loadings that carry in these forms of TN that are far less bioavailable (CMOM is basically unavailable N).

Jim: Is dissolved, bioavailable a reasonable characterization of the form of TN that was used to populate the graphs for the areas considered given the modeling approach that was utilized to generate the load estimates?

(b) (5)

River Dominated Systems

We understand that none of the areas used to populate the graphs were from river dominated systems. While we would observe that the entire GB system is river dominated (certainly as the loading source of TN, and from a transparency perspective due to the high CDOM and particulate load delivered which controls water clarity), it is obvious that the Piscataqua River segment of the estuary is “river dominated”, as , it is, a river, not an embayment, pond or bay.

Jim: Do you concur that the 2010 paper is not reasonably applicable to the dynamics occurring in the Piscataqua River system (which, incidentally has high CDOM levels, very low phytoplankton growth and ~ 1 day detention time due to the extreme tidal exchange with the Gulf of Maine)?

(b) (5)

Annual Average Loading

We understand that your paper employed annual average loading because the model that was employed to calculate the system loads, provided its output in that format. Moreover, as GW was the route of TN input, one would not have anticipated a significant seasonal load signature associated with the results so, whether you plotted only the amount of load occurring over the growing season (divide by two, plot same data) or annual average, the results would have looked the same.

Jim: Was there a biological reason for choosing annual average versus growing season? If not, do you concur that assessing GB inputs from a growing season load perspective is acceptable, so long as the appropriate adjustment is made to your loading estimates (i.e., divide by 2)?

(b) (5)

That should do it.

Thanks,

John

John C. Hall
Hall & Associates
1620 I Street, NW, Suite 701
Washington, DC 20006
Phone: 202-463-1166

Fax: 202-463-4207

E-Mail: jhall@hall-associates.com<<mailto:jhall@hall-associates.com>>

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From: Bukhari, Samir <Bukhari.Samir@epa.gov<<mailto:Bukhari.Samir@epa.gov>>>
Sent: Friday, November 9, 2018 10:00 AM
To: John Hall <jhall@hall-associates.com<<mailto:jhall@hall-associates.com>>>
Cc: Moraff, Kenneth <Moraff.Ken@epa.gov<<mailto:Moraff.Ken@epa.gov>>>; Clark Freise <clark.freise@des.nh.gov<<mailto:clark.freise@des.nh.gov>>>; Latimer, Jim <Latimer.Jim@epa.gov<<mailto:Latimer.Jim@epa.gov>>>; dean_peschel@yahoo.com<mailto:dean_peschel@yahoo.com>; Suzanne M. Woodland <smwoodland@cityofportsmouth.com<<mailto:smwoodland@cityofportsmouth.com>>>; Arsenault, Dan <Arseault.Dan@epa.gov<<mailto:Arseault.Dan@epa.gov>>>; Latimer, Jim <Latimer.Jim@epa.gov<<mailto:Latimer.Jim@epa.gov>>>
Subject: Latimer Working Responses

Dear John,

As requested, I have attached Dr. Latimer's working responses to the Coalition's information requests and questions.

Thank you,

Samir Bukhari
EPA Region 1
Office of Regional Counsel
5 Post Office Square
Boston, MA 02109

Personal Conference Line:
617-918-2222
Passcodes Entered at Prompts:
71095
2
123456

From: John Hall <jhall@hall-associates.com<<mailto:jhall@hall-associates.com>>>
Sent: Thursday, November 08, 2018 10:00 AM
To: Clark Freise <clark.freise@des.nh.gov<<mailto:clark.freise@des.nh.gov>>>; Latimer, Jim <Latimer.Jim@epa.gov<<mailto:Latimer.Jim@epa.gov>>>; Arsenault, Dan <Arseault.Dan@epa.gov<<mailto:Arseault.Dan@epa.gov>>>
Cc: 'Dean Peschel' <dean_peschel@yahoo.com<mailto:dean_peschel@yahoo.com>>; Suzanne M. Woodland <smwoodland@cityofportsmouth.com<<mailto:smwoodland@cityofportsmouth.com>>>
Subject: RE: Agenda - Science Review Meeting
Importance: High

Dear Clark/Dan:

As you know we didn't really get a chance to review the more detailed technical questions that had been submitted to better understand Jim's paper and its utility/proper application in the Great Bay system. After the meeting was over, Jim mentioned that he had drafted responses to the questions. We would like to receive that document as soon as possible, particularly given Jim's other medical priority that will have him unavailable for a while. I believe that

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within those responses and the clarifications Jim gave yesterday we can find a path forward to resolve the Piscataqua/Lonza issue promptly. The Great Bay/Little Bay analysis will take a bit more to analyze.

Can you please ask that Jim provide the responses that he has put together?

Thanks,

John

John C. Hall
Hall & Associates
1620 I Street, NW, Suite 701
Washington, DC 20006
Phone: 202-463-1166
Fax: 202-463-4207
E-Mail: jhall@hall-associates.com<<mailto:jhall@hall-associates.com>>

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