

**From:** [Freise, Clark](#)  
**To:** ["John Hall"](#); [Arsenault, Dan](#); [Latimer, Jim](#)  
**Cc:** [Moraff, Kenneth](#); [dean\\_peschel@yahoo.com](mailto:dean_peschel@yahoo.com); [Suzanne M. Woodland](#); [Bukhari, Samir](#); [Tom Gallagher](#)  
**Subject:** RE: Latimer Working Responses  
**Date:** Tuesday, November 13, 2018 3:44:55 PM

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John,

Dr. Latimer is in surgery today, so I am responding on behalf of the EPA/DES team. I left the meeting last week with the understanding that we were all going to continue to work towards the goal of a general permit for the Great Bay based on the nitrogen loading concept. The towns agreed to propose a loading level that would ensure water quality standards will be met throughout the entire Great Bay estuary and the science that would back that level up (as opposed to the 100 kg/hectare that has been discussed). The towns also agreed to fill in the “table” on how they believe that new proposed limit would look between the point source and non-point source targets. We would be glad to start reviewing and commenting on any studies you are beginning to focus on in proposing the loading level so that we can get together on Dec. 7<sup>th</sup> productively and efficiently.

Best regards,  
Clark

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**From:** John Hall [<mailto:jhall@hall-associates.com>]  
**Sent:** Friday, November 09, 2018 11:46 AM  
**To:** Freise, Clark; Arsenault, Dan; Latimer, Jim  
**Cc:** Moraff, Kenneth; [dean\\_peschel@yahoo.com](mailto:dean_peschel@yahoo.com); Suzanne M. Woodland; Bukhari, Samir; Tom Gallagher  
**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?*

### **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)?*

### **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)?*

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>  
**Sent:** Friday, November 9, 2018 10:00 AM  
**To:** John Hall <jhall@hall-associates.com>  
**Cc:** Moraff, Kenneth <Moraff.Ken@epa.gov>; Clark Freise <clark.freise@des.nh.gov>; Latimer, Jim <Latimer.Jim@epa.gov>; dean\_peschel@yahoo.com; Suzanne M. Woodland <smwoodland@cityofportsmouth.com>; Arsenault, Dan <Arsenault.Dan@epa.gov>; Latimer, Jim <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

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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 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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