

From: [Arsenault, Dan](#)
To: [Latimer, Jim](#)
Cc: [Cobb, Michael](#)
Subject: RE: Latimer Working Responses
Date: Monday, November 26, 2018 1:30:49 PM

Hi Jim – (b) (6). I'll look to set up a call for next week sometime to let you know where things are at. Thanks, dan

From: Latimer, Jim
Sent: Monday, November 26, 2018 12:16 PM
To: Arsenault, Dan <Arseault.Dan@epa.gov>; Weitzler, Ellen <Weitzler.Ellen@epa.gov>; Cobb, Michael <Cobb.Michael@epa.gov>; Moraff, Kenneth <Moraff.Ken@epa.gov>; Bukhari, Samir <Bukhari.Samir@epa.gov>
Subject: RE: Latimer Working Responses

I'm on board.

(b) (6)

I am available for a call sometime. (b) (6), I can have a call.
Jim

From: Arsenault, Dan
Sent: Monday, November 26, 2018 11:39 AM
To: Weitzler, Ellen <Weitzler.Ellen@epa.gov>; Cobb, Michael <Cobb.Michael@epa.gov>; Moraff, Kenneth <Moraff.Ken@epa.gov>; Bukhari, Samir <Bukhari.Samir@epa.gov>
Cc: Latimer, Jim <Latimer.Jim@epa.gov>
Subject: FW: Latimer Working Responses
Anyone have thoughts differing from Clark's?

From: Freise, Clark <Clark.Freise@des.nh.gov>
Sent: Monday, November 26, 2018 11:35 AM
To: Arsenault, Dan <Arseault.Dan@epa.gov>; Latimer, Jim <Latimer.Jim@epa.gov>
Cc: Moraff, Kenneth <Moraff.Ken@epa.gov>; Bukhari, Samir <Bukhari.Samir@epa.gov>
Subject: RE: Latimer Working Responses

EPA-colleagues,

I was writing a response to John, but have been advised that (due to a series of meetings that are occurring in real-time) no response at this time is probably the best response. I agree and hope you do also.

Best regards (b) (6),
Clark

From: John Hall [<mailto:jhall@hall-associates.com>]
Sent: Tuesday, November 20, 2018 1:43 PM
To: Freise, Clark; Arsenault, Dan; Latimer, Jim
Cc: Moraff, Kenneth; dean_peschel@yahoo.com; Suzanne M. Woodland; Bukhari, Samir; Tom Gallagher
Subject: RE: Latimer Working Responses

Jim

I hope your surgery went well. Any chance you feel well enough to provide feedback on the questions from my 11/9 email below?

THx

John

John C. Hall
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From: John Hall

Sent: Friday, November 9, 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?

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

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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 <Arseault.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>

Sent: Thursday, November 08, 2018 10:00 AM

To: Clark Freise <clark.freise@des.nh.gov>; Latimer, Jim <Latimer.Jim@epa.gov>; Arsenault, Dan <Arseault.Dan@epa.gov>

Cc: 'Dean Peschel' <dean_peschel@yahoo.com>; Suzanne M. Woodland <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 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

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