

MEMORANDUM

To: File, Taunton WWTP, NPDES No. MA0100897

From: Susan Murphy, Permit Writer

Date: March 13, 2015

Re: July 22, 2014 Supplemental Comments submitted by John Hall

EPA received the above document, characterized by the sender as “supplemental comments” on the Taunton WWTP Draft Permit, by email on July 22, 2014. Note the public comment period on the Draft Permit closed on June 17, 2013 and therefore this is not a timely comment pursuant to 122 C.F.R. 40 C.F.R. § 124.17(a)(2), and therefore no response is required. EPA has included the document in the Administrative Record for the Final Permit and considered the content of the comment as follows:

1. Peer Review Report re NHDES 2009 concerns a different type of analysis (stressor-response) than used here, and questions to peer reviewers did not address standard used for permit issuance. Prior peer review supported NHDES approach. As noted in supplemental comment, the underlying issue concerning validity of approach is addressed in timely filed comments.
2. Case cited concerns liability determination for a violation of water quality standards, not setting of permit limits. Causal standard is different. This issue also is addressed in timely filed comments.