

Attachment 3  
Email 3-11-2015, 5:50PM

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**Cc:** [JFederico@BETA-Inc.com](mailto:JFederico@BETA-Inc.com)  
**Sent:** Wednesday, March 11, 2015 5:05:25 PM  
**Subject:** RE: Taunton Estuary Project

Brian

This is the background information EPA used to state that the SMAST studies provide the basis for concluding that exceeding 5 ug/l chl a and TN of 0.45 means that the system is nutrient impaired. (See, Pages from Taunton Draft Permit Fact Sheet) As discussed in the Permit Fact Sheet they chose 0.45 mg/l also based on the claim that sample location 16 in Mount Hope Bay meets the 5 mg/l DO level and the TN present at that location is 0.45 mg/l. Therefore, that same TN level is needed to meet DO criteria in the Taunton Estuary. They called this some type of "Sentinel Method". We have correspondence from Craig Swanson and Steve Chapra indicating that this approach is not quite scientifically defensible. (Attached for your reading pleasure as well as the PowerPoint I did for suggesting to EPA a better way to evaluate the issues).

As I mentioned, I'm trying to organize the muni's to get a complete scientific evaluation of TN effects done for this system. Your input on the reasonableness of the selected estuary targets based on the SMAST studies would greatly assist in that effort.

So, to get everyone moving in the right direction it would be most helpful to get a short letter from you addressing the following points:

1. Whether EPA is misapplying the SMAST reports;
2. Whether from these reports it is possible to predict how an estuarine system's DO or chl a level will respond to a given nutrient level;
3. Whether the reports were intended to establish or recommend numeric values for TN or chl a that must be met to ensure nutrients do not adversely impact the Taunton system
4. Whether site specific information and modeling analyses are needed to properly assess the degree of nutrient control and algal level needed to protect estuarine systems and
5. Whether or not it is reasonable to conclude that a 0.45 mg/l TN level is the proper level needed to achieve DO criteria in the Taunton or MHB system, at this point.

Please do not hesitate to call me if you have any questions – these people really need some assistance in getting the science right.

*John*

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