

November 6, 2014

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Gina McCarthy, Administrator  
Mr. Chris Zarba, Director, Science Advisory Board  
USEPA Headquarters  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

RE: Center for Regulatory Reasonableness Request for SAB Peer Review of EPA Region 1 Sentinel Approach for Numeric Nutrient Criteria for Estuarine Waters

Dear Administrator McCarthy and Mr. Zarba,

The Massachusetts Coalition for Water Resources Stewardship (MCWRS) supports and asks for your consideration in granting the Center for Regulatory Reasonableness request for Science Advisory Board (SAB) peer review of EPA Region 1 “sentinel approach” for numeric nutrient criteria for estuarine waters. This methodology employed by Region 1 has been significantly questioned through qualified, independent scientific analysis. Protecting and improving the quality of our estuarine waters and assuring that local financial resources are used prudently demands that the best science be applied in setting discharge limits. MCWRS believes the “sentinel approach” used by Region 1 has been sufficiently questioned and peer review by SAB is needed. The “sentinel approach” used by Region 1 to set discharge limits in the Taunton River estuary and elsewhere in New England was evaluated by Tufts University professor Steven C. Chapra, Ph.D, a well-respected and noted environmental engineer. In his September 2014 report, *Assessment of the Scientific Basis of the Taunton Wastewater Treatment Plant Draft NPDES Permit (MA0100897)*, regarding the Region 1 “sentinel approach,” Dr. Chapra states: “I have critiqued many water quality plans and management schemes as an environmental engineer and water-quality expert and I must state that

this is the most technically weak effort I have examined over my 42 year career.” Dr. Chapra, who has been the lead researcher for EPA on multiple other water quality projects, clearly condemns the science behind this approach.

Regardless of whether your main interest lies in maximizing environmental protection, assuring public funds are spent wisely and effectively or finding a balance between the two, it should be agreed upon by all that sound science must form the basis of decision-making. The “sentinel approach” has been called into question and MCWRS agrees that it would be most appropriate for SAB to scrutinize this methodology before it impacts regional permitting decisions. We hope you will concur.

MCWRS is a non-profit organization dedicated to the application of sound science, cost consideration and best use of fiscal resources in water resource management regulation. Our membership includes cities and towns, wastewater districts, environmental engineering firms and legal firms with vested interests in environmental regulation and permitting.

Thank you for your consideration in this matter and feel free to contact MCWRS if you have any questions.

Sincerely,

A handwritten signature in black ink, reading "Philip D. Guerin". The signature is fluid and cursive, with the first name "Philip" being the most prominent.

Philip D. Guerin  
President

CC: Senator Warren  
Senator Markey  
Representatives McGovern, Neal, Tsongas, Lynch, Capuano, Kennedy, Clark, Keating,  
Tierney, Moulton  
Curt Spalding-EPA Region 1  
David Cash-MassDEP  
Taunton Mayor Tom Hoye  
Taunton DPW Director Fred Cornaglia