

# **Responses to Comments**

## **Public Review of Brayton Point Station NPDES Permit No. MA0003654**



U.S. Environmental Protection Agency  
Region 1 (New England)  
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**Responses to Comments**  
**Public Review of Brayton Point Station**  
**NPDES Permit No. MA0003654**

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## **Disclaimer**

This document contains summaries rather than verbatim comments received by the U.S. Environmental Protection Agency (EPA) on the Draft Permit issued by the Agency and the Massachusetts Department of Environmental Protection for the Brayton Point Station power plant in Somerset, Massachusetts. The Draft Permit was made available for public comment on July 22, 2002. Some of EPA's responses reflect on changes made to the Final Permit issued in tandem with this document. It is important to note that the responses in this document might differ slightly from the language in the Final Permit. The permit language, however, has precedence and is legally binding on Brayton Point Station.

## Preface

The U.S. Environmental Protection Agency's New England Region (Region 1) and the Massachusetts Department of Environmental Protection (MA DEP) are issuing a Final National Pollutant Discharge Elimination System Permit for the Brayton Point Station power plant in Somerset, Massachusetts, effective 60 days from the issuance date. This document presents EPA's response to the comments received on the Draft Permit (No. MA0003654) issued for Brayton Point Station on July 22, 2002. The individual responses explain and support EPA's determinations that form the basis of the Final Permit.

The comments and EPA's corresponding responses are organized under eight major subject areas or sections, as shown in the Contents. Preceding each individual comment/response grouping is a list of the document numbers to which it correlates, as shown in the following example:

<b>Response # VIII.1</b>	<b>Document #: 1218</b>
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The document numbers relate to individual commenters. Two tables are provided at the beginning of the document to help readers find comments and responses. One table provides an alphabetical listing of commenters and their affiliations, along with document numbers. The second table provides a list of commenters organized by document number.

Many responses include figures, footnotes and references. Footnotes and references are provided on the text pages and figures are provided at the back of the document.

Finally, many responses refer the reader to Appendices. These Appendices are provided as a separate, companion document. The Response to Comments document is available on EPA's Web site at [www.epa.gov/region1](http://www.epa.gov/region1). The related Appendices are available upon request to EPA; please contact Damien Houlihan at 617-918-1586.

## Acronyms, Abbreviations, and Symbols (Selective List)

AEI	Adverse Environmental Impact
AIM	Associated Industries of Massachusetts
ANOVA	Analysis of Variance [statistical model used to analyze data]
AR	Administrative Record
BACT	Best Available Control Technology
BAT	Best Available Technology
BCT	Best Conventional Pollutant Control Technology (also called Best Conventional Technology)
BIP	balanced, indigenous population of fish, shellfish and wildlife in the receiving water
BPJ	best professional judgment
BPS	Brayton Point Station
BPT	Best Practicable Treatment Technology
BT	benefits transfer
BTA	Best Technology Available
CAA	Clean Air Act
CALPUFF	Non-steady state meteorological and air quality modeling system by Earth Tech, Inc.
CAO	Critical Aquatic Organism
CBI	Confidential Business Information
CFR	Code of Federal Regulations
Cir.	Circuit [Court]
CLF	Conservation Law Foundation of New England
CMR	Code of Massachusetts Regulations
CP&L	Carolina Power & Light Company
CPUE	Catch Per Unit Effort [estimate of fishing effort or method to estimate resource abundance]
CSO	combined sewer overflow
CWA	Clean Water Act
CWIS	cooling water intake structure
CY	calendar year
dB(A)	A-weighted decibels
Dist.	District [Court]
DMR	Discharge Monitoring Report
DOE	Department of Energy
DOI	Department of the Interior

DPD	N,N-diethyl-p-phenylenediamine [agent used in analyzing water and wastewater samples for chlorine based on standard colorimetric techniques; Standard Method 4500-C1G and USEPA Method 330.5]
EAB	Environmental Appeals Board
ECP	Energy Clearing Price
EDF	Environmental Defense Fund
EFH	essential fish habitat
ELG	effluent limitations guideline
EMM	“Enhanced Multi-Mode” cooling system proposed by the permittee
EPA	Environmental Protection Agency
Fed. Reg.	<i>Federal Register</i>
FERC	Federal Energy Regulatory Commission
fps	feet per second
FOIA	Freedom of Information Act
GCO	EPA General Counsel’s Opinions
gpm	gallons per minute
HEA	Habitat Equivalency Analysis
HRC	Habitat Replacement Costs
HVAC	heating, ventilation, air-conditioning
I&E	impingement and entrainment
Id.	idem; “the same”
Inst.	Institute
IPM	Integrated Planning Model [a multi-regional, dynamic, deterministic linear programming model of the U.S. electric power sector developed by ICF Resources Incorporated]
ISO	independent system operator
ISO-NE	Independent System Operator of New England [bulk electricity generation & transmission]
LD	Legionnaire’s Disease
Leg. Hist.	Legislative History
LMS	Lawler, Matusky & Skelly Engineers, LLP, consultant to the permittee
LNG	liquid natural gas
MA DMF	Massachusetts Division of Marine Fisheries
MA DEP	Massachusetts Department of Environmental Protection
MA CZM	Massachusetts Office of Coastal Zone Management
MBtu	million British thermal units
MDI	methylene diphenyl isocyanate

MFG, Inc.	[subsidiary of Tetra Tech; Tetra Tech-MFG], consultant to EPA
MGD	million gallons per day
mg/l	milligrams per liter
ML	method detection limit
mm	millimeter
MOA	Memorandum of Agreement
MRI	Marine Research, Inc., consultant to permittee
MSS	Manchester Street Station, Rhode Island power plant also owned by the permittee
MW	megawatt
MW-hr	megawatt-hour
NAAQS	National Ambient Air Quality Standards
NASA	National Aeronautics and Space Administration
NBE	Narragansett Bay Estuary
NEERS	New England Estuarine Research Society
NEPCO	New England Power Company, former owner of BPS
NMFS	National Marine Fisheries Service
NOAA	National Oceanic and Atmospheric Administration
NO <sub>x</sub>	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NRDC	Natural Resources Defense Council
O&M	operation and maintenance
OGC	EPA's Office of the General Counsel
P&P	protection and propagation
PAH	polycyclic aromatic hydrocarbon
PG&E-NEG	Pacific Gas & Electric National Energy Group, subsidiary of PG&E Corp.; owner of USGen NE, the permittee and owner/operator of BPS
POTW	publicly owned treatment works
PSD	Prevention of Significant Deterioration
PUD	Public Utility District
RA	Regional Administrator of EPA
RAMAS	Risk Assessment, Management, and Audit Systems, software by Applied Biomathematics
RI DEM	Rhode Island Department of Environmental Management
RI DFW	Rhode Island Division of Fish and Wildlife (part of RI DEM)
RIS	Representative Important Species
S&W	Stone and Webster
SA	A MA and RI State Water Quality Classification Code

SAIC	Science Applications International Corporation, consultant to EPA
SB	A MA and RI State Water Quality Classification Code
SIDTEC	[A mechanical system for cleaning condensers at thermal power plants that reduces the use of chlorine and other biocides. Developed by Superior I.D. Tube Cleaners Inc.]
TAC	Technical Advisory Committee
TBtu	trillion British thermal units
TMDL	Total Maximum Daily Load
TRC	TRC Environmental Corporation, consultant to the permittee
TRO	total residual oxidant
TSS	total suspended solids
U.S.C.	United States Code
USGen NE	USGen New England, a subsidiary of PG&E-NEG, the permittee and owner/operator of BPS
USGen	shorthand for USGen NE
UWAG	Utility Water Action Group, trade association of electric generating companies
v.	versus
VSD	variable-speed drive (for water pumps)
WET	Whole Effluent Toxicity (a type of toxicity test)
WQS	water quality standard
WWTF	wastewater treatment facility
yr	year
§, §§	section, sections
°C	degrees Celsius (as in 25 °C; note spacing)
°F	degrees Fahrenheit



## Commenters and Their Affiliations

Commenter	Affiliation	Doc #	Response Nos.
Ackerman, Frank - Ph.D.	N/A	1130	IV.66-85, VII.15-38
Affonso, George	PG&E	1183	VII.1
Aguiar, Jobelle	N/A	1101	VII.1, VII.93
Aker, Joanne C.	N/A	1111	VII.1, VII.85, VII.93
Aker, Joanne C.	N/A	1126	VII.1
Allen, George	N/A	1038	II.10, II.11, III.68, IV.51
Anderson Family, The	N/A	1108	VII.1
Anderson, William R.	N/A	1026	VII.74
Arruda, Andy	N/A	1239	VII.125
Asaro, Matthew & Andrea	N/A	1120	VII.1
Ashcroft, Richard	N/A	1003	IV.91
Ashworth, Glenn	N/A	1058	VII.1
Avery, Josey	Prudence Conservancy	1143	VII.1
Avreccia, Kenneth	Local 51 Plumbers & Pipefitter Union	1131	IV.87, VII.97
Bain, Peter	N/A	1024	VII.1
Barrett, David	PG&E	1186	IV.61-65
Bartlett, Michael J.	U.S. Department of the Interior	1148	II.3, III.53, III.59, III.60, III.61, III.62, IV.45, IV.52, IV.94, VII.98
Beck, Allan	N/A	1121	IV.86, VII.1, VII.96
Bell, Edward L.	N/A	1154	VII.101
Bennett, Tim	N/A	1086	II.10, III.68, VII.1
Bennett, Timothy	Green Futures	1197	VII.1, VII.110
Berard, L. Leandre	N/A	1128	VII.1
Berard, Leandre	Green Futures	1199	VII.1, VII.112
Berard, Lee	Green Futures	1235	VII.1
Berman, Stanley & Eileen	N/A	1048	VII.1
Bisagni, James J. - Ph.D	N/A	1091	IV.60, VII.1, VII.75
Blanchard, Christy Law	N/A	1070	III.68, IV.60, VII.1
Bordon, Ellen	PG&E	1205	II.13
Botelho, Tony	PG&E	1200	IV.61-65, VII.1
Botelho, Tony	PG&E	1215	VII.76, VII.117
Botelho, Tony	PG&E	1200	IV.61-65, VII.1
Botelho, Tony	PG&E	1215	VII.76, VII.117
Brady, Richard	N/A	1233	VII.1
Brooks, Priscilla; Chatwin Anthony; and Rawn, Carol Lee	CLF	1132	III.53, III.73-82, IV.45, IV.66-85, IV.95-110, V.9-11, VII.10-14, VII.15-38, VIII.63
Browder, Anna	N/A	1020	VII.1
Buchsbaum, Robert - Ph.D.	Mass Audubon Society	1136	II.3, III.58, VII.1
Burrows, Janice	N/A	1061	VII.1
Callahan, Joseph	N/A	1019	IV.54, VII.1
Carvalho, Joe	Coalition for Social Justice	1193	VII.109
Castongvay, Joseph	N/A	1192	II.19, VII.1, VII.108
Castro III, Vacso	Bristol, RI, Town of - Conservation Commission	1001	VII.1

Commenter	Affiliation	Doc #	Response Nos.
Castro III, Vasco	Hopeworth Community Association	1142	VII.1
Castro, Everett	N/A	1189	IV.61-65, VII.84
Castro, Everett J.	N/A	1093	VII.1
Chace, Rick	N/A	1088	VII.1, VII.75, VII.77
Chatwin, Anthony	CLF	1180	II.7, III.53, III.57, IV.54, VII.70
City Council	Fall River, City of	1007	VII.1, VII.75
Colosi, Petter D.	NOAA	1155	II.11, III.63, III.72, VII.102
Colt, Rosemary M.	N/A	1060	VII.1
Corbishley, John W.	N/A	1041	VII.1
Costello, Neal	Rubin & Rudman	1173	VII.76, VII.105
Costello, Neil	Competitive Power Coalition	1228	VII.76
Cranmer, David	N/A	1045	VII.1, VII.15-38
Crawley, Wesley C.	N/A	1009	VII.1
Daniels, Susan	N/A	1081	VII.75
Danzberger, Alex	N/A	1065	VII.1
Dator, John	N/A	1179	VII.1, VII.15-38
Davis, Robert W.	Taunton River Watershed Alliance	1135	VII.1
DeAlteris, Joseph	DeAlteris Associates	1191	II.4
Desrochers, Louise M.	N/A	1046	VII.1
Dione, David	N/A	1198	VII.75, VII.76, VII.111
Dionne, David P.	N/A	1027	VII.1
Dormody, Sheila	Clean Water Action	1217	VII.75, VII.118
Downing, John	Stone and Webster	1178	IV. 61-65
Downing, John	Stone and Webster	1216	IV.61-65
DuBois, Pine	Jones River Watershed Association	1190	VII.107
Durfee, Nancy	N/A	1063	VII.75
Edward, Jack	N/A	1097	VII.1
Edwards, Mary Ann	Portsmouth, RI, Town of	1213	VII.1, VII.75
Ehrlich, Lori	Healthlink	1138	VII.1, VII.75, VII.89
Embrey, Robert	N/A	1002	II.18, VII.80
Feeney, Kathy	N/A	1069	VII.1
Felag, Senator Walter	RI State Senator	1243	VII.75
Ferris, Monte	N/A	1181	II.12, VII.1
Folliard, James	N/A	1116	VII.1, VII.94
Franklin, Lisa	PG&E	1240	VII.126
Froner, Jane	N/A	1051	VII.1
Fuchs, Louis A. - M.D.	N/A	1068	VII.1
Fulford, Robert L.	N/A	1096	II.10, III.71, VII.92
Furtado, Stephen - Superintendent of Schools	N/A	1172	VII.15-38
Fyfe, Sandy	N/A	1117	VII.1
Gagnon, Eleanor - Chairman	Somerset, Town of - Board of Health	1170	IV.91
Gagnon, Eleanor L. - Chairman	Somerset - Board of Health	1006	III.69, VII.81
Gallison, Raymond E.	RI State Representative	1209	II.10, II.14, VII.75
Gallison, Rep. Raymond E.	N/A	1147	VII.1
Gamettie Family, The	N/A	1113	VII.1
Gessler, Robert	N/A	1083	VII.1
Gill, Anita	N/A	1072	VII.75, VII.88
Gill, Anita	N/A	1055	VII.1, VII.88

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Commenter	Affiliation	Doc #	Response Nos.
Gillespie, Gay	Westport River Watershed Alliance	1137	III.68, VII.1, VII.75
Greenwood, Clifton	Clifton Health Care	1201	VII.75, VII.113
Grumond, C.	N/A	1017	VII.1
Haddad, Patricia	State Representative	1167	VII.1, VII.15-38
Hall, Jim	N/A	1013	VII.1
Hallberg, Richard N.	Warren Land Conservation Trust	1144	VII.1, VII.93
Hamel, Armand	PG&E	1236	III.49, III.50
Hamel, Armand	N/A	1008	III.49, III.50
Hamel, Bob	N/A	1062	III.68, IV.51, VII.75, VII.76
Handy, Seth	N/A	1037	III.46, III.68
Harrison, Jane	Warren, RI, Town of - Conservation Commission	1000	VI.29, VII.1, VII.79
Harrison, Jane	N/A	1214	II.8
Heroux, Jeffrey P.	N/A	1110	VII.1, VII.15-38
Hogan, Brian P. - D.M.D	N/A	1042	III.68, IV.60, VII.1, VII.75
Hogan, Lori	N/A	1090	VII.1
Hogon, Brian & Lori	N/A	1014	VII.1
Hood, Roger	N/A	1182	III.69, VII.81
Hood, Roger & Virginia	N/A	1011	II.69, VII.81, VII.82
Horn, Nelson	N/A	1012	IV.61-65
Hornsey, Rev. James H.	N/A	1036	III.68, IV.51, VII.1, VII.75, VII.91
Hovey, C.	N/A	1025	VII.1
Howard, Paul J.	New England Fisheries Management Council	1160	III.63, IV.55
Iribe, Chris	PG&E	1164	IV.66-85, VII.1
Jacobs, Wendy	Foley & Hoag	1218	III.1-44, IV.1-44, IV.61-65, V.1-8, VI.3-28, VII.2-9, VII.39-67, VII.78, VII.127, VII.128, VIII.162
Jan H. Reitsma	RI DEM	1152	IV.88, VII.100
Juhasz, Susan	N/A	1122	VII.1
Karce, Diane	N/A	1085	VII.75
Karcz, Diane	N/A	1242	VII.75
Keith, Joseph	N/A	1016	III.70, VII.83
Kelly, Nathan E.	N/A	1052	VII.1, VII.75
Kennedy, Rep. Patrick	N/A	1146	IV.54, IV.61-65
Kerr, Meg	Rhode Island Rivers Council	1153	VII.1
Ketschke, Barry	PG&E	1165	II.4, II.5, II.6, IV.66-85, VII.1
Ketschke, Barry	PG&E	1206	VII.1, VII.15-38
Kinsella, Mil	Sullivan	1028	III.52, VII.75
Kinsella, Mil	Sullivan	1078	VII.75
Kortright, Petern F.	Fall River Area Chamber of Commerce & Industries	1156	IV.66-85, VII.1
Kverek, Rosemary	N/A	1054	VII.87
Langhauser, Andrea D.	Mass Office of Environmental Affairs	1149	VII.1, VII.99
Leary, Don	N/A	1073	VII.1
Leary, Eileen	N/A	1033	III.45, VII.77
Lee, Camilla	N/A	1056	II.10, III.68, VII.71, VII.89

Commenter	Affiliation	Doc #	Response Nos.
Leeson, Robert	N/A	1035	II.10, VII.15-38, VII.75
Lepare, Shirley & Gary	N/A	1030	VII.1
Lepare, Shirley & Gary	N/A	1031	VII.1
Lima, Alfred	N/A	1034	IV.61-65, VII.1, VII.73, VII.84, VII.91
Lund, William	N/A	1194	VII.1
Lycurgus, Dina	N/A	1067	III.47, VII.75
Lynch, Patrick	N/A	1226	VII.1
MacPherson, Douglas	RI Saltwater Anglers Association	1230	IV.90, VII.122
Malone, Patrick	N/A	1071	III.68, IV.51, VII.75
Martin, David	N/A	1015	VII.1
Mass, Bob	N/A	1227	II.10, IV.66-85
Massie Family, The	N/A	1053	II.10, III.68, IV.60, VII.86
McAuliff, John	Somerset, Town of - Board of Selectmen	1169	VII.75
McCormick, Lillian	N/A	1022	II.10, III.51, VII.1
McGreavy, Connie L.	N/A	1075	III.68, VII.15-38
McLaughlin, Walter H. - Attorney at Gilman McLaughlin & Hanrahan	Town of Somerset - Board of Selectmen	1004	IV.61-65, IV.66-85, IV.91, VII.15-38, VII.75
Medeiros, Stephen	RI Saltwater Anglers Association	1225	II.10, III.68, VI.2
Meehan, Bill	Somerset Board of Selectmen	1168	IV.61-65, IV.66-85, IV.91, VII.1, VII.15-38, VII.75
Melucci, Frank & Louise	N/A	1029	VII.77
Menard, Joan	MA State Senator	1166	VII.1
Miller, Julie	N/A	1074	III.68
Mis, Marianne	N/A	1112	VII.1, VII.93
Moreira, Suzanne	N/A	1129	VII.1, VII.91
Morra, Joe & Susan	N/A	1087	VII.1
Morrill, Ann	Kickemuit River Council	1145	VI.29, VII.77
Morrill, Ann	Kickemuit River Council	1224	VII.120
Morrill, Ken	N/A	1232	VII.1
Morris, Morris D.	N/A	1064	VII.15-38
Morris, Morris D.	N/A	1064	VII.15-38
Morris, Robert	RI Inshore Trawler Fishing Association	1204	II.10, VII.77
Morris, Robert	RI Trawler Association	1220	II.10, II.15, II.16, VI.2, VII.72, VII.75, VII.77, VII.119
Murgo, Anthony D.	N/A	1118	VII.75, VII.95
O'Hearn, Jim	N/A	1124	VII.1, VII.85, VII.93
Oliver, E.	N/A	1044	VII.1
O'Shea, John V.	Atlantic States Marine Fisheries Commission	1241	VII.1
Page, Donna	N/A	1107	VII.1
Palen, Don G.	N/A	1082	VII.1
Paquette, Darryl J., Esq.	Coalition for Buzzards Bay, The	1134	VII.1
Parella, Joseph F.	Town of Bristol, RI	1005	IV.54
Park, Richard, <i>et al</i>	N/A	1099	II.10, III.52
Parker, Kathy L.	N/A	1105	VII.1, VII.85, VII.93
Parker, Kathy L.	N/A	1127	VII.1
Pearson, Stephanie	N/A	1114	VII.1
Phillips, Aimee & Carlin J.	N/A	1076	VII.1

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<b>Commenter</b>	<b>Affiliation</b>	<b>Doc #</b>	<b>Response Nos.</b>
Polk, Catherine	Sakonnet River Association	1188	VII.1
Powers, Thomas	PG&E	1238	VII.1
Powers, Tom	PG&E	1203	IV.61-65, IV.66-85
Ramit, Peter	PG&E	1195	IV.66-85, VII.1, VII.76
Ramitt Jr., Peter	PG&E	1234	VII.1
Rapoza, Michael	N/A	1018	VII.1
Rawn, Carol Lee	CLF	1175	III.73-82, IV.61-65, IV.95-110, V.9-11, VII.10-14, VIII.63
Reitsma, Jan	RI DEM	1161	III.56, III.58, IV.49, IV.50, IV.56, IV.57, IV.58, VII.104
Reitsma, Jan H.	RI DEM	1211	II.10, II.11, III.67, III.68, IV.51, IV.60, VII.1, VII.115
Rhoury, Henry	N/A	1010	II.9
Richard P. Leavitt	N/A	1094	VII.1, VII.91
Richard, N.	N/A	1043	VII.85
Riley, William K.	N/A	1077	III.68
Rio, Robert	Associated Industries of Massachusetts	1187	IV.61-65, VII.15-38
Roberts, Evelyn	N/A	1100	VII.1
Robinson, Patricia	N/A	1047	VII.1
Rothschild, Brian	UMass Dartmouth	1176	III.66
Rucci, Micheal	N/A	1222	II.10, VII.75
Ruggiero, Richard	Bristol, RI - Town Council	1212	VII.1, VII.75, VII.93, VII.116
Ruth Perlow	N/A	1098	VII.1
Savage, Deidre	New England Council, The	1174	VII.15-38, VII.76, VII.105
Sax, Jennifer	Gradient Corp	1221	IV.89
Saxe, Jennifer	Grady Corporation	1196	IV.89
Shea, Susan H.	N/A	1057	VII.1
Silva, Donna	N/A	1100	VII.1
Silverman, Stephen	Somerset - Economic Development Commission	1171	VII.15-38
Simas, Meredith	PG&E	1202	IV.59
Simas, Meredith	PG&E	1207	VII.1
Sittig, Tricia	N/A	1125	VII.1
Skinner, Tom	Mass CZM	1159	III.64, III.65, IV.46, VI.1, VII.69
Smith, James	N/A	1237	IV.61-65, VI.1, VII.75, VII.76, VII.124
Spalding, H. Curtis	Save the Bay	1133	II.1, II.2, III.53, III.54, III.55, III.56, III.57, III.73-82, III.83, IV.47, IV.48, IV.53, IV.66-85, IV.95-110, IV.111, V.9-11, VII.10-14, VII.15-38, VII.68, VIII.63
Stavins, Robert	Analysis Group	1223	IV.61-65, IV.66-85, VII.15-38
Stavins, Robert	N/A	1184	IV.66-85, VII.15-38
Stephen Zbyszewski	N/A	1095	III.47, III.48
Storey, David and Barbara	N/A	1066	III.47, III.68

Commenter	Affiliation	Doc #	Response Nos.
Stottmeir, Kurt D.	N/A	1023	VII.1
Sullivan, Kevin	N/A	1084	VII.75
Sullivan, Kristin	N/A	1080	VII.75
Sullivan, Patricia	N/A	1079	VII.75, VII.90
Taylor, Terry	N/A	1050	VII.1
Tollefson, Carolynne	Canoll	1229	IV.61-65, VII.1, VII.75, VII.76, VII.121
Torgan, John	Save the Bay	1177	IV.66-85, IV.92, VII.1, VII.106
Torgan, John	Save the Bay	1231	VII.1, VII.123
Trainor, Michael C.	N/A	1092	VII.1, VII.75
Travis, Philip	Mass State Representative	1210	II.17, IV.61-65, IV.93, VII.76
Urba, Janis	Larel Park Improvement Association	1139	VI.29
Vashon, Norma W.	N/A	1049	VII.1
Walsh, Anna	N/A	1103	VII.1
Walsh, C. R.	N/A	1106	VII.1
Walsh, Charles	N/A	1109	VII.1
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Watts, Douglas	N/A	1119	VII.1, VII.91
Welch, Gail	N/A	1089	VII.1
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Whittemore, Ron	N/A	1032	VII.1, VII.75
Wilkins, Dianne	N/A	1021	VII.1, VII.75
Williams Family, The	N/A	1059	VII.1
Wislocki, Louis C.	N/A	1123	VII.1
Woods, Charlie	N/A	1039	III.68, IV.51
Worrell, Richard D.	N/A	1040	VII.1
Zoto, George A.	N/A	1158	VII.103
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	Kickemuit Middle School	1157	VII.1

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1000	Harrison, Jane	Warren, RI, Town of - Conservation Commission	VI.29, VII.1, VII.79
1001	Castro III, Vacso	Bristol, RI, Town of - Conservation Commission	VII.1
1002	Embrey, Robert	N/A	II.18, VII.80
1003	Ashcroft, Richard	N/A	IV.91
1004	McLaughlin, Walter H. - Attorney at Gilman McLaughlin & Hanrahan	Town of Somerset - Board of Selectmen	IV.61-65, IV.66-85, IV.91, VII.15-38, VII.75
1005	Parella, Joseph F.	Town of Bristol, RI	IV.54
1006	Gagnon, Eleanor L. - Chairman	Somerset - Board of Health	III.69, VII.81
1007	City Council	Fall River, City of	VII.1, VII.75
1008	Hamel, Armand	N/A	III.49, III.50
1009	Crawley, Wesley C.	N/A	VII.1
1010	Rhoury, Henry	N/A	II.9
1011	Hood, Roger & Virginia	N/A	II.69, VII.81, VII.82
1012	Horn, Nelson	N/A	IV.61-65
1013	Hall, Jim	N/A	VII.1
1014	Hogon, Brian & Lori	N/A	VII.1
1015	Martin, David	N/A	VII.1
1016	Keith, Joseph	N/A	III.70, VII.83
1017	Grumond, C.	N/A	VII.1
1018	Rapoza, Michael	N/A	VII.1
1019	Callahan, Joseph	N/A	IV.54, VII.1
1020	Browder, Anna	N/A	VII.1
1021	Wilkins, Dianne	N/A	VII.1, VII.75
1022	McCormick, Lillian	N/A	II.10, III.51, VII.1
1023	Stottmeir, Kurt D.	N/A	VII.1
1024	Bain, Peter	N/A	VII.1
1025	Hovey, C.	N/A	VII.1
1026	Anderson, William R.	N/A	VII.74
1027	Dionne, David P.	N/A	VII.1
1028	Kinsella, Mil	Sullivan	III.52, VII.75
1029	Melucci, Frank & Louise	N/A	VII.77
1030	Lepare, Shirley & Gary	N/A	VII.1
1031	Lepare, Shirley & Gary	N/A	VII.1
1032	Whittemore, Ron	N/A	VII.1, VII.75
1033	Leary, Eileen	N/A	III.45, VII.77
1034	Lima, Alfred	N/A	IV.61-65, VII.1, VII.73, VII.84, VII.91
1035	Leeson, Robert	N/A	II.10, VII.15-38, VII.75
1036	Hornsey, Rev. James H.	N/A	III.68, IV.51, VII.1, VII.75, VII.91
1037	Handy, Seth	N/A	III.46, III.68
1038	Allen, George	N/A	II.10, II.11, III.68, IV.51
1039	Woods, Charlie	N/A	III.68, IV.51
1040	Worrell, Richard D.	N/A	VII.1

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1041	Corbishley, John W.	N/A	VII.1
1042	Hogan, Brian P. - D.M.D	N/A	III.68, IV.60, VII.1, VII.75
1043	Richard, N.	N/A	VII.85
1044	Oliver, E.	N/A	VII.1
1045	Cranmer, David	N/A	VII.1, VII.15-38
1046	Desrochers, Louise M.	N/A	VII.1
1047	Robinson, Patricia	N/A	VII.1
1048	Berman, Stanley & Eileen	N/A	VII.1
1049	Vashon, Norma W.	N/A	VII.1
1050	Taylor, Terry	N/A	VII.1
1051	Froner, Jane	N/A	VII.1
1052	Kelly, Nathan E.	N/A	VII.1, VII.75
1053	Massie Family, The	N/A	II.10, III.68, IV.60, VII.86
1054	Kverek, Rosemary	N/A	VII.87
1055	Gill, Anita	N/A	VII.1, VII.88
1056	Lee, Camilla	N/A	II.10, III.68, VII.71, VII.89
1057	Shea, Susan H.	N/A	VII.1
1058	Ashworth, Glenn	N/A	VII.1
1059	Williams Family, The	N/A	VII.1
1060	Colt, Rosemary M.	N/A	VII.1
1061	Burrows, Janice	N/A	VII.1
1062	Hamel, Bob	N/A	III.68, IV.51, VII.75, VII.76
1063	Durfee, Nancy	N/A	VII.75
1064	Morris, Morris D.	N/A	VII.15-38
1065	Danzberger, Alex	N/A	VII.1
1066	Storey, David and Barbara	N/A	III.47, III.68
1067	Lycurgus, Dina	N/A	III.47, VII.75
1068	Fuchs, Louis A. - M.D.	N/A	VII.1
1069	Feeney, Kathy	N/A	VII.1
1070	Blanchard, Christy Law	N/A	III.68, IV.60, VII.1
1071	Malone, Patrick	N/A	III.68, IV.51, VII.75
1072	Gill, Anita	N/A	VII.75, VII.88
1073	Leary, Don	N/A	VII.1
1074	Miller, Julie	N/A	III.68
1075	McGreavy, Connie L.	N/A	III.68, VII.15-38
1076	Phillips, Aimee & Carlin J.	N/A	VII.1
1077	Riley, William K.	N/A	III.68
1078	Kinsella, Mil	Sullivan	VII.75
1079	Sullivan, Patricia	N/A	VII.75, VII.90
1080	Sullivan, Kristin	N/A	VII.75
1081	Daniels, Susan	N/A	VII.75
1082	Palen, Don G.	N/A	VII.1
1083	Gessler, Robert	N/A	VII.1
1084	Sullivan, Kevin	N/A	VII.75
1085	Karce, Diane	N/A	VII.75
1086	Bennett, Tim	N/A	II.10, III.68, VII.1
1087	Morra, Joe & Susan	N/A	VII.1
1088	Chace, Rick	N/A	VII.1, VII.75, VII.77



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1089	Welch, Gail	N/A	VII.1
1090	Hogan, Lori	N/A	VII.1
1091	Bisagni, James J. - Ph.D.	N/A	IV.60, VII.1, VII.75
1092	Trainor, Michael C.	N/A	VII.1, VII.75
1093	Castro, Everett J.	N/A	VII.1
1094	Richard P. Leavitt	N/A	VII.1, VII.91
1095	Stephen Zbyszewski	N/A	III.47, III.48
1096	Fulford, Robert L.	N/A	II.10, III.71, VII.92
1097	Edward, Jack	N/A	VII.1
1098	Ruth Perlow	N/A	VII.1
1099	Park, Richard, <i>et al</i>	N/A	II.10, III.52
1100	Roberts, Evelyn	N/A	VII.1
1101	Aguiar, Jobelle	N/A	VII.1, VII.93
1102	Walsh, Judith	N/A	VII.1, VII.93
1103	Walsh, Anna	N/A	VII.1
1104	Walsh, Cody	N/A	VII.1
1105	Parker, Kathy L.	N/A	VII.1, VII.85, VII.93
1106	Walsh, C. R.	N/A	VII.1
1107	Page, Donna	N/A	VII.1
1108	Anderson Family, The	N/A	VII.1
1109	Walsh, Charles	N/A	VII.1
1110	Heroux, Jeffrey P.	N/A	VII.1, VII.15-38
1111	Aker, Joanne C.	N/A	VII.1, VII.85, VII.93
1112	Mis, Marianne	N/A	VII.1, VII.93
1113	Gamettie Family, The	N/A	VII.1
1114	Pearson, Stephanie	N/A	VII.1
1115	Walsh, Charles R.	N/A	VII.1
1116	Folliard, James	N/A	VII.1, VII.94
1117	Fyfe, Sandy	N/A	VII.1
1118	Murgo, Anthony D.	N/A	VII.75, VII.95
1119	Watts, Douglas	N/A	VII.1, VII.91
1120	Asaro, Matthew & Andrea	N/A	VII.1
1121	Beck, Allan	N/A	IV.86, VII.1, VII.96
1122	Juhasz, Susan	N/A	VII.1
1123	Wislocki, Louis C.	N/A	VII.1
1124	O'Hearn, Jim	N/A	VII.1, VII.85, VII.93
1125	Sittig, Tricia	N/A	VII.1
1126	Aker, Joanne C.	N/A	VII.1
1127	Parker, Kathy L.	N/A	VII.1
1128	Berard, L. Leandre	N/A	VII.1
1129	Moreira, Suzanne	N/A	VII.1, VII.91
1130	Ackerman, Frank - Ph.D.	N/A	IV.66-85, VII.15-38
1131	Avreccia, Kenneth	Local 51 Plumbers & Pipefitter Union	IV.87, VII.97
1132	Brooks, Priscilla; Chatwin Anthony; and Rawn, Carol Lee	CLF	III.53, III.73-82, IV.45, IV.66-85, IV.95-110, V.9-11, VII.10-14, VII.15-38, VIII.63

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1133	Spalding, H. Curtis	Save the Bay	II.1, II.2, III.53, III.54, III.55, III.56, III.57, III.73-82, III.83, IV.47, IV.48, IV.53, IV.66-85, IV.95-110, IV.111, V.9-11, VII.10-14, VII.15-38, VII.68, VIII.63
1134	Paquette, Darryl J., Esq.	Coalition for Buzzards Bay, The	VII.1
1135	Davis, Robert W.	Taunton River Watershed Alliance	VII.1
1136	Buchsbaum, Robert - Ph.D.	Mass Audubon Society	II.3, III.58, VII.1
1137	Gillespie, Gay	Westport River Watershed Alliance	III.68, VII.1, VII.75
1138	Ehrlich, Lori	Healthlink	VII.1, VII.75, VII.89
1139	Urba, Janis	Larel Park Improvement Association	VI.29
1140		Eastern Rhode Island Conservation District	VI.29, VII.1, VII.77
1141		Eastern Rhode Island Conservation District	VI.29, VII.1, VII.77
1142	Castro III, Vasco	Hopeworth Community Association	VII.1
1143	Avery, Josey	Prudence Conservancy	VII.1
1144	Hallberg, Richard N.	Warren Land Conservation Trust	VII.1, VII.93
1145	Morrill, Ann	Kickemuit River Council	VI.29, VII.77
1146	Kennedy, Rep. Patrick	N/A	IV.54, IV.61-65
1147	Gallison, Rep. Raymond E.	N/A	VII.1
1148	Bartlett, Michael J.	U.S. Department of the Interior	II.3, III.53, III.59, III.60, III.61, III.62, IV.45, IV.52, IV.94, VII.98
1149	Langhauser, Andrea D.	Mass Office of Environmental Affairs	VII.1, VII.99
1150	Whitehouse, Sheldon	Rhode Island Attorney General	II.1, III.73-82, IV.61-65, IV.66-85, IV.95-110V.9-11, VII.1, VII.10-14, VII.15-38, VIII.63
1151	Whitehouse, Sheldon	Rhode Island Attorney General	IV.61-65, VII.1
1152	Jan H. Reitsma	RI DEM	IV.88, VII.100
1153	Kerr, Meg	Rhode Island Rivers Council	VII.1
1154	Bell, Edward L.	N/A	VII.101
1155	Colosi, Petter D.	NOAA	II.11, III.63, III.72, VII.102
1156	Kortright, Petern F.	Fall River Area Chamber of Commerce & Industries	IV.66-85, VII.1
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1158	Zoto, George A.	N/A	VII.103
1159	Skinner, Tom	Mass CZM	III.64, III.65, IV.46, VI.1, VII.69
1160	Howard, Paul J.	New England Fisheries Management Council	III.63, IV.55
1161	Reitsma, Jan	RI DEM	III.56, III.58, IV.49, IV.50, IV.56, IV.57, IV.58, VII.104
1164	Iribe, Chris	PG&E	IV.66-85, VII.1
1165	Ketschke, Barry	N/A	II.4, II.5, II.6, IV.66-85, VII.1
1166	Menard, Joan	MA State Senator	VII.1
1167	Haddad, Patricia	State Representative	VII.1, VII.15-38

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1168	Meehan, Bill	Somerset Board of Selectman	IV.61-65, IV.66-85, IV.91, VII.1, VII.15-38, VII.75
1169	McAuliff, John	Somerset, Town of - Board of Selectmen	VII.75
1170	Gagnon, Eleanor - Chairman	Somerset, Town of - Board of Health	IV.91
1171	Silverman, Stephen	Somerset - Economic Development Commission	VII.15-38
1172	Furtado, Stephen - Superintendent of Schools	N/A	VII.15-38
1173	Costello, Neal	Rubin & Rudman	VII.76, VII.105
1174	Savage, Deidre	New England Council, The	VII.15-38, VII.76, VII.105
1175	Rawn, Carol Lee	CLF	III.73-82, IV.61-65, IV.95-110, V.9-11, VII.10-14, VIII.63
1176	Rothschild, Brian	UMass Dartmouth	III.66
1177	Torgan, John	Save the Bay	IV.66-85, IV.92, VII.1, VII.106
1178	Downing, John	Stone & Webster	IV.61-65
1179	Dator, John	N/A	VII.1, VII.15-38
1180	Chatwin, Anthony	CLF	II.7, III.53, III.57, IV.54, VII.70
1181	Ferris, Monte	N/A	II.12, VII.1
1182	Hood, Roger	N/A	III.69, VII.81
1183	Affonso, George	PG&E	VII.1
1184	Stavins, Robert	N/A	IV.66-85, VII.15-38
1186	Barrett, David	PG&E	IV.61-65
1187	Rio, Robert	Associated industries of Massachusetts	IV.61-65, VII.15-38
1188	Polk, Catherine	Sakonnet River Association	VII.1
1189	Castro, Everett	N/A	IV.61-65, VII.84
1190	DuBois, Pine	Jones River Watershed Association	VII.107
1191	DeAlteris, Joseph	DeAlteris Associates	II.4
1192	Castongvay, Joseph	N/A	II.19, VII.1, VII.108
1193	Carvalho, Joe	Coalition for Social Justice	VII.109
1194	Lund, William	N/A	VII.1
1195	Ramit, Peter	PG&E	IV.66-85, VII.1, VII.76
1196	Saxe, Jennifer	Grady Corporation	IV.89
1197	Bennett, Timothy	Green Futures	VII.1, VII.110
1198	Dione, David	N/A	VII.75, VII.76, VII.111
1199	Berard, Leandre	Green Futures	VII.1, VII.112
1200	Botelho, Tony	PG&E	IV.61-65, VII.1
1201	Greenwood, Clifton	Clifton Health Care	VII.75, VII.113
1202	Simas, Meredith	PG&E	IV.59
1203	Powers, Tom	PG&E	IV.61-65, IV.66-85
1204	Morris, Robert	RI Inshore Trawler Fishing Association	II.10, VII.77
1205	Bordon, Ellen	PG&E	II.13
1206	Ketschke, Barry	PG&E	VII.1, VII.15-38
1207	Simas, Meredith	PG&E	VII.1
1208	Whitehouse, Sheldon	Rhode Island Attorney General	IV.66-85, VII.1, VII.15-38, VII.114
1209	Gallison, Raymond E.	RI State Representative	II.10, II.14, VII.75
1210	Travis, Philip	Mass State Representative	II.17, IV.61-65, IV.93, VII.76

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1211	Reitsma, Jan H.	RI DEM	II.10, II.11, III.67, III.68, IV.51, IV.60, VII.1, VII.115
1212	Ruggiero, Richard	Bristol, RI - Town Council	VII.1, VII.75, VII.93, VII.116
1213	Edwards, Mary Ann	Portsmouth, RI, Town of	VII.1, VII.75
1214	Harrison, Jane	N/A	II.8
1215	Botelho, Tony	PG&E	VII.76, VII.117
1216	Downing, John	Stone and Webster	IV.61-65
1217	Dormody, Sheila	Clean Water Action	VII.75, VII.118
1218	Jacobs, Wendy	Foley & Hoag	III.1-44, IV.1-44, IV.61-65, V.1-8, VI.3-28, VII.2-9, VII.39-67, VII.78, VII.127, VII.128, VIII.162
1220	Morris, Robert	RI Trawler Association	II.10, II.15, II.16, VI.2, VII.72, VII.75, VII.77, VII.119
1221	Sax, Jennifer	Gradient Corp	IV.89
1222	Rucci, Micheal	N/A	II.10, VII.75
1223	Stavins, Robert	Analysis Group	IV.61-65, IV.66-85, VII.15-38
1224	Morrill, Ann	Kickamuit River Council	VII.120
1225	Medeiros, Stephen	RI Saltwater Anglers Association	II.10, III.68, VI.2
1226	Lynch, Patrick	N/A	VII.1
1227	Mass, Bob	N/A	II.10, IV.66-85
1228	Costello, Neil	Competitive Power Coalition	VII.76
1229	Tollefson, Carolynne	Canoll	IV.61-65, VII.1, VII.75, VII.76, VII.121
1230	MacPherson, Douglas	RI Saltwater Anglers Association	IV.90, VII.122
1231	Torgan, John	Save the Bay	VII.1, VII.123
1232	Morrill, Ken	N/A	VII.1
1233	Brady, Richard	N/A	VII.1
1234	Ramitt Jr., Peter	PG&E	VII.1
1235	Berard, Lee	Green Futures	VII.1
1236	Hamel, Armand	PG&E	III.49, III.50
1237	Smith, James	N/A	IV.61-65, VI.1, VII.75, VII.76, VII.124
1238	Powers, Thomas	PG&E	VII.1
1239	Arruda, Andy	N/A	VII.125
1240	Franklin, Lisa	PG&E	VII.126
1241	O'Shea, John V.	Atlantic States Marine Fisheries Commission	VII.1
1242	Karcz, Diane	N/A	VII.75
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- B. Estimated Electricity Rate Impacts of Thermal Discharge/Cooling Water Intake Permit for Brayton Point Station—Update of Prior Analysis and Response to Comments. Abt Associates, Inc., August 20, 2003.
- C. Update of Social Cost Analysis for Closed Cycle System Installation at Brayton Point Station. Memorandum from Michael Fisher and Riley Newbert, Abt Associates, Inc., to Mark Stein and Damien Houlihan, USEPA Region 1, and Shari Goodwin, Tetra Tech, Inc., August 20, 2003.
- D. Response to Comments on Notice of Data Availability, Proposed Regulations to Establish Requirements for Cooling Water Intake Structures at Phase II Existing Facilities Submitted by PG&E to EPA Region 1. Memorandum from Elena Besedin, Marisa Mazotta, and Robert Johnston, Abt Associates, Inc., to Mark Stein and Phil Colarusso, USEPA Region 1, August 28, 2003.
- E. Meta-Analysis of Non-Use Benefits. Memorandum from Elena Besedin, Ryan Wardwell, and Michael Fisher, Abt Associates, Inc., to Mark Stein and Phil Colarusso, USEPA Region 1, September 2, 2003.
- F. Response to Comments on Assessment of Recreational Fishing Benefits Presented in EPA Region 1's July 22, 2002, Draft Determination on the NPDES Permit for Brayton Point Station, Somerset, MA. Memorandum from Svetlana Semenova, Elena Besedin, and Michael Fisher, Abt Associates, Inc., to Mark Stein and Phil Colarusso, USEPA Region 1, September 2, 2003.
- G. Response to Comments on the Habitat Replacement Analysis of I&E Losses at Brayton Point. Memorandum from Elena Besedin, Ryan Wardwell, and Michael Fisher, Abt Associates, Inc., to Mark Stein and Phil Colarusso, USEPA Region 1, September 2, 2003.
- H. Response to Comments on Non-Use Benefits Presented in EPA Region 1's July 22, 2002, Draft Determination on the NPDES Permit for Brayton Point Station, Somerset, MA. Memorandum from Elena Besedin and Ryan Wardwell, Abt Associates, Inc., to Mark Stein and Phil Colarusso, USEPA Region 1, September 2, 2003.
- I. Non-Use Benefits Break-Even Analysis for Brayton Point. Memorandum from Elena Besedin and Ryan Wardwell, Abt Associates, Inc., to Phil Colarusso and Mark Stein, USEPA Region 1, September 19, 2003.
- J. Potential Effects of Revised I&E Estimates Submitted by Stratus Consulting on September 16, 2003, on the Estimated Benefits of Installation of Cooling Towers at BPS. Memorandum from Elena Besedin, Abt Associates, Inc., to Mark Stein and Phil Colarusso, USEPA Region 1, September 18, 2003.
- K. Response to Comments on Assessment of Recreational Fishing Benefits Presented in EPA Region 1's July 22, 2002, Draft Determination on the NPDES Permit for Brayton Point Station, Somerset, MA. Memorandum from Svetlana Semenova, Elena Besedin, and Michael Fisher, Abt Associates, Inc., to Mark Stein and Phil Colarusso, USEPA Region 1, September 18, 2003.

- L. Brayton Point Power Station Cooling Towers Noise Impact Assessment, Project Report. Hatch, Inc., September 29, 2003.
- M. An Evaluation of Cooling Tower Plume Studies Done for the Brayton Point Generating Station. MFG, Inc., July 2003.
- N. Comparison of Cooling Tower Costs. SAIC, 2003.
- O. Technical Memorandum No. 1: Brayton Point Comment Summary and Response. Memorandum from Gary Petrazzuolo, SAIC, to Damien Houlihan, USEPA Region 1, and Shari Goodwin, Tetra Tech, Inc., September 15, 2003.
- P. Technical Memorandum No. 2: Revisions to and Results from the Clean Water Act Section 316(b) Cost Methodology for the Brayton Point Station. Memorandum from Gary Petrazzuolo, SAIC, to Damien Houlihan, USEPA Region 1, and Shari Goodwin, Tetra Tech, Inc., September 15, 2003.
- Q. Technical Memorandum No. 3: Statistical Analysis of USGen Costs versus SAIC Costs. Memorandum from Gary Petrazzuolo, SAIC, to Damien Houlihan, USEPA Region 1, and Shari Goodwin, Tetra Tech, Inc., September 15, 2003.
- R. Technical Memorandum No. 4: Construction Cost Monetary Outlay Schedule. Memorandum from Faysal Bekdash, SAIC, to Damien Houlihan, USEPA Region 1, and Shari Goodwin, Tetra Tech, Inc., September 15, 2003.
- S. Technical Memorandum No. 5: Summary of Brayton Point Cost Analyses. Memorandum from Gary Petrazzuolo, SAIC, to Damien Houlihan, USEPA Region 1, and Shari Goodwin, Tetra Tech, Inc., September 15, 2003.
- T. Technical Memorandum No. 6: Estimation of Number of Cooling Towers for Closed Cycle Entire Station. Memorandum from John Sunda, SAIC, to Damien Houlihan, USEPA Region 1, and Shari Goodwin, Tetra Tech, Inc., September 15, 2003.
- U. Technical Memorandum No. 7: Brayton Point Station Trip Report. Memorandum from Faysal Bekdash and Ronald Guthrie, SAIC, to Damien Houlihan, USEPA Region 1, and Shari Goodwin, Tetra Tech, Inc., September 15, 2003.
- V. Recommendations re Recreational Fishing Losses at Brayton Point. Stratus Consulting Inc., September 16, 2003.
- W. Recommendations re Commercial Fishing Losses and Benefits at Brayton Point. Stratus Consulting Inc., September 19, 2003.
- X. Responses to Comments on EPA New England's July 22, 2002, Determination on the New Draft NPDES Permit for the Brayton Point Station, Somerset, MA. Memorandum from Liz Strange, Rob Raucher, David Allen, Dave Mills, Dave Cacela, and Tom Ottem, Stratus Consulting Inc., to Phil Colarusso, USEPA Region 1, September 16, 2003.