



**Comments on
Terry Creek Superfund Site Outfall Ditch/Operable Unit 1
Proposed Plan Fact Sheet June 2015
Prepared by Environmental Stewardship Concepts, LLC
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Introduction

This *Proposed Plan Fact Sheet* is a summary of the findings in the *Focused OU1 Remedial Investigation/Feasibility* released in December, 2014. ESC has commented previously on several documents leading up to this Proposed Plan and will repeat these comments here, where necessary. Overall, the major issues still exist and EPA is urged to not accept this cleanup option as adequate or final.

Regarding the cleanup options, the Proposed Plan still fails to offer as the preferred alternative a quadruple box culvert, increased amount of sediment removal, use of an activated carbon cap for deeper sediments, or consider biodegradation via bioremediation methods. EPA needs to address: **Why does the preferred alternative not include the four box culvert, relocation of the ditch, substantially greater sediment removal and biodegradation?**

The Remedial Investigation is wholly inadequate in determining the full nature and extent of the contamination in terms of spatial and depth distribution, chemical composition, toxicity, contamination distribution through all environmental media and risks to human health and ecological receptors. Bioassays need to be conducted for sediments (surface and deep), pore water, surface water, plant matter as food and prey items.

The *Feasibility Study* presumes a remedy in the design and stated purpose, and fails to offer a full range of remediation alternatives for analysis. In this regard, the Feasibility Study does not meet regulatory requirements.

Environmental Justice issues at Terry Creek

This Proposed Plan fails to meet the intent or specific requirements of the Environmental Justice Executive Order or the EPA Strategic Plan on EJ, or the practices that have been conducted by EPA at other CERCLA sites where there are EJ issues. There is no estimation of cumulative risks, no Environmental Justice Analysis, and no specific assessment of exposures and risks from contaminated fish (and other seafood) consumption to the fishing public. As a result, the Proposed Plan should be withdrawn and corrected in order to complete the necessary work to achieve EJ goals.

Why did EPA not conduct an EJ analysis?

Why did EPA fail to consider the fish consumption exposures of the African American community in Brunswick?

How will this Proposed Plan address EJ problems that exist in Brunswick now and in the future?

Presidential Executive Order 12898 of 1994 indicates that all federal agencies will take steps to achieve environmental justice and in section 1-101 directs:

"...each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations"

Section 3-3 specifically directs each agency to conduct analyses accordingly:

"(b) Environmental human health analyses, whenever practicable and appropriate, shall identify multiple and cumulative exposures. "

The Executive Order further directs agencies to specifically address issues concerning consumption of fish and wildlife (in Section 4-4).

Brunswick is predominately African American, with 11% Latino, both minority communities. The US census for 2010 indicates that Glynn County is 33.3% non-white, but Brunswick City is approximately 59% African American, shown in the tables below.

Glynn County-Brunswick, GA Census Data

Glynn County

<http://quickfacts.census.gov/qfd/states/13/13127.html>

Brunswick

<http://quickfacts.census.gov/qfd/states/13/1311560.html>

Demographics (2010)	City of Brunswick	State of GA
White alone	31.4%	59.7%
Black/African American alone	59.2%	30.5%
Hispanic/Latino	11.3%	8.8%
White alone (not Hispanic or Latino)	27.5%	55.9%
Asian alone	0.6%	3.2%
American Indian/Alaska Native alone	0.3%	0.3%
Native Hawaiian/other Pacific Islander alone	0.1%	0.1%
Two or more races	2.0%	2.1%

Demographics (2009-2013)	City of Brunswick	State of GA
Language other than English spoken at home (age 5+)	13.9%	13.3%
High School graduate or higher (age 25+)	78.1%	84.7%
Bachelor's degree or higher (25+)	12.3%	28%
Per capita money income in past 12 months (2013 dollars)	\$17,232	\$25,182
Median household income	\$29,106	\$49,179
Persons below poverty level	37.9%	18.2%

The facts are that the population has been exposed to releases of contaminants from this site for a period approaching 100 years, exposures from all pathways over the entire period have not been characterized and are likely substantial, the population is predominately African American, fish consumption has not been analyzed at this site, all chemicals have not been assessed, notably dioxins, and the current Proposed Plan will leave substantial contaminated sediment in place.

In the professional judgment of ESC, LLC, the Plan will result in continued health risks to the population, disproportionately so for the African American anglers.

Chemical contamination at the Terry Creek Site, OU1

This particular site has been contaminated with pesticide residues, wastes, products and by-products of chemical synthesis and manufacturing processes conducted over a period of approximately 100 years. The RI/FS and Proposed Plan focus on a specific category of chlorinated camphenes with no consideration of other pesticide manufacturing processes, products, wastes or by-products. This omission is so serious that even known contaminants of chlorinated camphene production, i.e. dioxins, are omitted from serious consideration and evaluation at the site. For this reason alone, the RI must be considered inadequate and rejected until such time as all chemical contaminants, including and especially dioxins, are fully characterized at the site.

Why has EPA not included dioxins and furans in the RI analysis as contaminants?

Will EPA require measurement of dioxins/furans in sediment, soil and groundwater at the site?

Chlorinated camphene

Much is discussed in the RI, the FS and the Proposed Plan about toxaphene, a particular commercial formulation of chlorinated camphenes, in bulk synthesis. This discussion diverts the Agency and the public from the critical question of the toxicity of

the environmental media at the site. EPA needs to know the sediment toxicity, pore water toxicity, surface water toxicity, and biota toxicity to humans and the full range of ecological receptors (mammals, birds, fish, reptiles, invertebrates, etc.).

What is the toxicity of site environmental media, including sediment (surface and at depth), pore water, surface water, and biota?

Chlorinated camphenes are equated with technical toxaphene, erroneously; the two terms do not refer to the same chemical(s). Furthermore, the documents make a series of false assumptions about the chemical composition of sources, wastes, by-products, effluents and receiving waters over a period of many decades of activity at the plant that is the source of contamination at this site. Any estimate of current conditions based on past activities is mere speculation owing to the absence of critical information on the complete chemical composition of waste streams, receiving water hydrodynamics, pH, salinity, temperature, sediment load, dissolved organic carbon content, particulate organic carbon content and other factors. In short, the only scientifically defensible method to assess chemical contamination at the OU1 site is to make measurements using the EPA approved method.

Methods of measuring chlorinated camphenes (toxaphene)

The Proposed Plan seeks to continue the obfuscation of measuring chlorinated camphenes in the body of the text and in Appendix A of the RI/FS. Three different methods are available and have been used to measure concentrations of this group of compounds, Method 1, Method 2 and EPA Method 8276. Only one method, EPA Method 8276, is officially promulgated for applications such as Terry Creek. In fact, sediment samples from Terry Creek were used in the validation of the EPA Method 8276.

Appendix A of the RI/FS was conducted and prepared by Hercules consultants Geosyntec, with other labs completing the lab work. This Appendix indicates that EPA Method 8276 is the most sensitive method, but calls on using Method 2 in addition to Method 8276, because of consistency with historical sampling that used Method 2. The problem lies in the cover letter that states the Appendix recommended against using Method 8276, when such a statement is not made in the Appendix. This document is not Agency policy and not an official document on measuring chlorinated camphenes.

The body of the Proposed Plan continues the obfuscation in text that the risks and toxicity is overly complicated. The complication is created by the PRP. EPA has an approved method (Method 8276) and the data obtained by other methods is insufficient for an accurate site assessment, a point supported by the RI/F Appendix A data.

All of the data given in the Proposed Plan were obtained using Method 1 or Method 2, or both, and thus underestimates by 4-10 fold. These data are clearly inadequate to make remedial design conditions, and not sufficient for estimating health risks.

Why does EPA accept the data using measuring methods that are inaccurate and that underestimate concentrations of contaminants?

Will EPA use EPA Method 8276 exclusively for this site in the future?

Given that most of the data in the RI are not accurate measures of environmental contamination, how will EPA handle the inaccurate data to determine remediation requirements?

Dioxins/furans

The documents ignore dioxins and furans, known contaminants of the processes at this facility at this site and listed in the documentation for the waste disposal pit 009 for this plant. Reports from the waste pit show elevated levels of dioxins/furans in the solid/sludge material and even in groundwater. Dioxins/furans do not dissolve in groundwater because they do not dissolve in pure or distilled water; dioxins are highly hydrophobic and dissolve in organic solvents, such as the benzene that contaminates groundwater at the 009 site. The presence of dioxins/furans in sludge waste and groundwater at the disposal site indicates that the source is equally contaminated, at least.

The scientific literature on dioxins and furans is abundant and has documented the multiple human health and ecological effects of exposures to these chemicals. An updated literature search on dioxins for the last few years and extending back to earlier literature. Additionally, EPA is still working on the Dioxin Reassessment, although the IRIS listing for non-cancer health effects was published in 2012. The EPA official position on dioxin toxicity has developed over the years, but has not fundamentally changed since the early years of the reassessment. Basically, dioxin is a complete carcinogen, causes a host of non-cancer effects at low doses over short term exposures, and some non-cancer health effects display linear no-threshold response characteristics.

How will EPA incorporate the IRIS RfD into the Terry Creek site remediation?

Will EPA establish a PRG for dioxins in fish, in surface waters and in sediments?

The literature search results are given at the end of this document.

Groundwater contamination

How is the remediation method expected to keep groundwater contamination from remobilizing?

The groundwater is now a source of contamination that needs to be addressed so that it does not re-contaminate the site once it is remediated. The upper surficial aquifer is primarily unconfined with only some isolated areas that are under semi-confined conditions. This geologic structure indicates the possibility for vertical movement in the groundwater. In the most recent groundwater monitoring report, there are still exceedances of VOCs at the former toxaphene surface impoundment within the upper surficial aquifer. Monitoring wells near the OU1 Outfall Ditch (MW-29D and -38D) show increasing trends in contaminants of concern including benzene, chlorobenzene and xylenes. The metals barium and chromium also continue to be a problem in the groundwater.

Previous Comments

From our comments on the *Draft Focused Remedial Investigation/Feasibility Study Report Operable Unit 1 (OU1) Outfall Ditch*, February 2014:

General Comments

Environmental Stewardship Concepts has previously commented on the *Focused Remedial Investigation/Feasibility Study Work Plan* (January 2012) and the *Remedial Alternative Screening Technical Memorandum* (December 2012) for OU1 at Terry Creek. Many of the comments from these previous documents are still not addressed, and as such, are reiterated in this review of the Draft RI/FS. This RI/FS is incomplete and inadequate for a variety of reasons that are explained below. EPA is urged to insist on a revision to this draft.

In an EPA document, *Ombudsman Report: More Information is Needed on Toxaphene Degradation Products* (USEPA 2005), the Office of Inspector General contends that more information is needed on toxaphene degradation products and that EPA should validate, approve, and use the gas chromatography with negative ion mass spectroscopy (NIMS) method that can test for these products. [Method 8276 has been finalized, as of October 2012; Revision 1 is dated July 2014 and is attached here for reference.] The EPA's report further states "Academia and the European Union have successfully used the NIMS method for at least 5 years to test for toxaphene degradation products in the environment," i.e. since the year 2000. As the method is currently being used, validation and approval steps would not be a difficult or lengthy process for the EPA.

Important in the assessment of toxaphene to human and ecological health is that receptors are exposed to the degradation products [present in the environment], not the

original technical toxaphene mixture as originally synthesized or released. Degradation is assumed to be minimal or non-existent, yet no data are available to confirm these assumptions under conditions at Terry Creek over the time period applicable to this site. It should be further determined which toxaphene congeners pose the most risk to human health, where p26, p50, p62, p40, p41, and p44 have been found in fish tissues (Fiolet and van Veen 2001) or soil (Maruya 2001a) or both. Where some congeners are easily metabolized and excreted, others are poorly metabolized and not readily excreted, accumulating in the body (Maruya 2000). Studies indicate that only five (p26, p50, p40, p41, and p44) of the 200 congeners of toxaphene are not easily metabolized by the human body, these contributing to the long-term chronic toxaphene exposure in humans.

The potential exposure pathways are also important to the assessment of toxaphene degradation products in ecological and human risk assessment. Scientific investigations indicate that the main exposure contributing to human health risk is from fish consumption and potential sources of drinking water (Fiolet and van Veen 2001, Buranatreveth 2004). Additionally, babies are exposed to toxaphene degradation products *in utero* as well as after birth through mother's milk. Jacobson (1996) indicates that developing embryos are the most susceptible to organochlorines, such as toxaphene, among others, which has been linked to impaired cognitive development (i.e. low IQ scores).

The Inspector General's report directly addresses Terry Creek, noting Method 8081's failure to detect toxaphene's degradation products in any fish samples taken in 1997. When the same samples were re-analyzed in 2001 by Dr. Maruya of the Skidaway Institute of Oceanography, the NIMS method found toxaphene congener concentrations of up to 1,420 ppb (2001b).

References

Buranatreveth, S. 2004. Cancer Risk Assessment of Toxaphene. *Industrial Health*, 42: 321-327.

Jacobson, J.L. et al. 1996. Intellectual Impairment in Children Exposed to Polychlorinated Biphenyls in Utero. *New England Journal of Medicine*, 335: 783-789.

Fiolet, D.C.M. and M.P. van Veen. 2001. Toxaphene Exposure in the Netherlands. National Institute of Public Health and the Environment, RIVM Report 604502-003.

Maruya, Keith A. et al. 2000. Prominent Chlorobornane Residues in Estuarine Sediments Contaminated with Toxaphene. *Environmental Toxicology and Chemistry*. 19:2198-2203.

Maruya, Keith A., et al. 2001a. Selective Persistence and Bioaccumulation of Toxaphene in a Coastal Wetland. American Chemical Society, Chapter 12: 164-174.

Maruya, Keith A. et al. 2001b. Residues of toxaphene in finfish and Shellfish from Terry and Dupree Creeks. Georgia, USA Estuaries 24:585-596.

US EPA, Office of Inspector General. Ombudsman Report: More Information is Needed on Toxaphene Degradation Products. December 16, 2005. Report no. 2006-P-00007

Specific Comments

In reviewing the *Draft Focused Remedial Investigation/Feasibility Study*, several of our previously submitted comments for OU1 Terry Creek documents, *Focused Remedial Investigation/Feasibility Study Work Plan* (January 2012) and the *Remedial Alternative Screening Technical Memorandum* (December 2012), still apply and are listed here, followed by comments on the current 2015 documents: the RI/FS, Appendix A to the RI/FS and the Proposed Plan.

Focused Remedial Investigation/Feasibility Study Work Plan (January 2012):

- Dioxin concentrations need to be measured in all sediment samples, as well as in pore water, suspended sediment and animal tissue, owing to the presence of dioxin in toxaphene products.
- The report claims that EPA Method 8276 is not necessary because of previous data collection, as explained on page 14: "Since Method 1 is the most widely used method and is analogous to the SW 846 Method 8081B, the data from this method is what will be used to inform remedial decisions at the Site." [now page 17]. This statement is factually incorrect. Method 8276 is the official and approved method for measuring chlorinated camphenes or toxaphene.
- **Why does EPA not simply rely on the Method (Method 8276) that has been promulgated by the agency for measuring toxaphene?**
- The Work Plan for the RI/FS also anticipated leaving contamination in place that may pose continued risks to ecological receptors, indicated by the suggestion that the remediation may take the form of a performance based, rather than a standards-based or risk-based cleanup. The Work Plan needs to provide a method by which the remediation will be protective of ecological systems and human health.

Remedial Alternative Screening Technical Memorandum (December 2012)

- The RI/FS report basically discounts or ignores the chemicals besides toxaphene that are present as site contaminants. This omission underestimates the risks from chemicals to humans and ecological receptors.

- The RI/FS is correct that there is not enough sediment deposition to apply any form of natural recovery (an unproven approach for many situations, especially with chemicals that do not degrade naturally like toxaphene).
- Alternative and *in situ* methods could have been considered in the FS part of the report, but were completely absent. New methods may have advantages that are not possible with conventional approaches.
- Ultimately, none of the alternatives will bring this site to a conclusive cleanup if the ongoing source of toxaphene is not remediated successfully, and this report does nothing to address this most important issue.
- The considerable discussion over toxicity values for toxaphene or chlorinated camphenes, presents an issue that remains unresolved. EPA needs to take a position on this matter and insist that the values developed and used by EPA are the ones that the company will ascribe to and use.
- In a similar manner, the methods for measuring toxaphene present a problem that needs to be resolved by the Agency. It is unclear what EPA testing method was used for "Method 1 Technical toxaphene" and no explanation is given to how "Method 2 Total Area Under the Curve (TUAC)" was calculated. Hercules did run some samples under Method 8276, which is a more improved method over Method 8081 for testing for weathered toxaphene, but these results are not given in the report. Hercules needs to use Method 8276 for the remaining samples. More discussion on this point is presented in these comments.
- The text says that the detailed Conceptual Site Model is "under development" and will be in the final RI/FS report, contrary to guidance and standard. That is not the way to proceed. EcoRA guidelines from 1998 clearly state that the CSM comes first. Also see Glen Suter et al. textbooks on general Ecological Risk Assessment and ecological risk assessments for contaminated sites. The proposition that a conceptual site model is not prepared at a later time, but is supposed to be prepared at the outset. The RI/FS must include a conceptual site model.
- The plan calls for composite samples (page 24), which is inappropriate for characterizing the distribution, nature and extent of contamination, as EPA guidance dictates.
- This RI/FS wholly ignores conducting a Human Health Risk Assessment, with no mention of human health risks in a specific context. The RI/FS must, at the very least, include a summary of human health risks by noting the exposure pathways, types of health effects, what is known of dose-response relationships and a characterization of risks. But to completely exclude a section on human health is not acceptable. Any examination of the nature and extent of contamination demands an analysis of human health effects.

- The report only contains an Ecological Conceptual Site Model, with no reference to an analysis of human health.
- The area surrounding the Outfall Ditch is too residential to be cleaned up to a non-residential standard.
- The RI/FS alternatives do nothing to permanently remove contaminated sediments, only to ineffectively, remove contact with the contaminated sediment. The capping remedies require monitoring in perpetuity, which would greatly increase their costs. These costs are not adequately and fully characterized.
- The RI/FS on page 38 indicates that dioxins were measured in two sediment samples, which is consistent with information that dioxin is a contaminant of toxaphene production. The next statement that the dioxin in sediment samples must be derived from other sources is not credible and needs to be removed.
- Any discussion about construction times, possible contamination during construction, and difficulties of remediating the existing ditch without re-routing, are all trivial. For a remediation project of this small scale (as compared to the Hudson River which is undergoing dredging), a greater amount of sediment removal must be a larger part of the alternatives.
- If shallow groundwater in the vicinity of the ditch likely discharges into the Outfall Ditch and Dupree Creek, then groundwater needs to be better characterized and analyzed as a possible source of contaminants. The groundwater plume associated with the plant, while being managed under RCRA, is wholly dismissed and mentioned only once in the RI/FS.
- **How will EPA address the problem of recontamination by existing and future groundwater contamination of OU1, the Outfall Ditch?**
- The Ecological Conceptual Site Model only contains very general reference to groups of wildlife, not taking any one species specifically as a representative in that environment to determine its actual exposure pathways. Specific receptors can and should be used in the ecological risk assessment.
- The ecological risk assessment fails to consider the accumulation of toxaphene or chlorinated camphenes in marsh grass, *Spartina alterniflora* as a component in the exposure analysis and trophic transfer of toxaphene. ESC has previously submitted material on this point.
- Only one of the wildlife groups under consideration includes prey as a exposure pathway. This limited approach is wholly insufficient as prey items are a major source of contaminant exposure for chemicals such as chlorinated camphenes and dioxins that are bioaccumulative. For these chemicals, the food consumption pathway is considered the most significant of possible exposure pathways. In the present case, with no empirical data on exposures, there is no reason to conclude otherwise.

- **Why has EPA not insisted that site data on exposures be collected by the PRP?**
- **Does EPA assume that exposures to all receptors are as given in the Exposure Factors Handbook?**
- The SLERA and the determination as to whether a BERA should follow must include the data analyzed under the approved EPA Method 8276.
- Comparison of toxaphene and chlorinated camphenes found in fish pre- and post-remediation should not have been used to relax fish consumption guidelines when the post-remediation (2001) included different areas and species sampled than the pre-removal (1997) effort.
- The Outfall Ditch is being prioritized as a source of toxaphene to be remediated, but the larger issue is still the source of toxaphene to the Outfall Ditch, which has not been documented as remediated since the completion of corrective actions in 2010 on the Plant and the N-Street Ditch that feed into the Outfall Ditch. There was no reduction in fish tissue toxaphene in 2011. Additional testing must be done to confirm any measurable impact from the corrective actions.
- **What is the depth of contamination across the entire site? Has EPA accepted a depth at which no contamination occurs, and is therefore "clean?"**
- The NIMS method (Method 8276) has been performed in consideration of planning for OU2 and OU3, but is not relied upon for OU1, according to the Proposed Plan. As the Outfall Ditch is the source issue, environmental media in the ditch must be analyzed with the best/most sensitive congener evaluation available (Method 8276)
- The RI/FS contains the laboratory results of toxaphene breakdown products using the outdated methods, not the official EPA Method 8276, but the evaluation of the data will be performed under "separate cover" which means that the results will not adequately inform this remediation effort at the Outfall Ditch. The full data set and evaluation need to be included here. Appendix A seems to present
- It is unclear if there was ever any dredging of the triple box culvert at any time in its history. A disadvantage of a culvert is the need for periodic cleanout of the silting sediment.
- It is unclear how the accumulated volume of sediment since the previous removal was calculated (estimated to be: Pre-weir = 7500 cy and post-weir = 10,500 cy)
- The seepage rate (net gain of groundwater into the Outfall Ditch) pre-weir is 1,352 gpd and post-weir is 2,593 gpd. This information indicates a lot of seepage from groundwater into the Outfall Ditch not to be considered a contaminated source

- Net groundwater discharged into the Outfall Ditch may be substantial, based on the area being a “gaining” area, but this section seems to downplay the potential VOC contribution of groundwater.
- Section 8.3.2 of the FS explains the Remedial Action Objectives. All four are objectives to reduce exposures with no objective for removal of the source material or eliminating toxicity. The completion exclusion of removal as an objective seems completely inconsistent with EPA directives and guidance to treat or remove toxicity before relying on covering the source. This RI/FS lacks consideration of removal or treatment options. As a result, this Proposed Plan is deficient in failing to present appropriate remedies of a sufficient range and that satisfy ARARs.
- Section 8.3.4 of the FS on page 60 refers to MNR associated with reductions in surface sediment toxaphene concentrations, but fails to note that toxaphene degradation in the sediment is sufficiently slow that burial is the process that takes place. Wisely, MNR is not considered any further.
- Similarly, in Section 8.3.4 on pages 60-61, the RI/FS discounts removal because it is too difficult and too expensive, but fails to provide any substantive or meaningful support for this position. The RI/FS needs to give more than token consideration to removal.
- There is no consideration given to bioremediation, despite the fact that Hercules has conducted pilot studies with new methods for bacterial degradation.
- There is no discussion of testing excavated material for contaminants that is temporarily stockpiled to be used as backfill.
- A report of this size and importance (the RI/F) should have an Executive Summary and an Abbreviations page to make the material more accessible to the public.
- The preferred alternative uses armoring of remaining contaminated sediments left in place to prevent erosion, disturbance etc. This approach is not practical in the long term for a site that is basically a tidal salt marsh zone for several reasons. First of all, sea level rise will inundate the location. Second, changes in flow patterns and erosion in nearby areas will alter the existing flow patterns and the "new" flow patterns that are to be put in place with the remediation. Finally, extreme weather events such as hurricanes, floods and localized flooding will erode the stability of the armored area, exposing contaminated sediments. The armoring will have to be inspected annually and repairs made as needed.
- **If or when the site is disrupted or inundated, will EPA insure that further remedial actions are taken to address recontamination by contaminants left in place? Has EPA accounted for this cost?**

Importance of Seafood Consumption Surveys

Seafood consumption surveys need to be conducted in the Brunswick area. This information is integral to effectively reaching anglers, boaters, and recreationists about the seafood consumption advisories in the area. ESC conducted an analysis of seafood consumption advisories in southeastern states including North Carolina, South Carolina, Florida, Mississippi, and Louisiana. Research has found that fish consumption advisories alone are ineffective at reaching recreational anglers and people who eat fish. Even when advisories are seen, people tend to not always understand, trust, or follow them. Studies have found that differences in fish consumption advisory awareness vary among subpopulations, including gender, ethnicity, geographic area, age, and education. Furthermore, national seafood consumption rates do not always accurately reflect local data.

What will EPA do to include fish consumption information in the effectiveness of the remedy before and after remedial actions?

Signs posted at sites under advisory appear to be one of the most popular methods of dispersing advisories; however, a study conducted in Louisiana found that only 20% of respondents became aware of advisories via signs at landings, boat launches, fishing sites, and bait shops. Targeted outreach to the most exposed and susceptible population is encouraged, particularly during the most popular times for fishing. Mass media and mail-outs were the most effective and preferred methods of receiving advisory info; these methods should be used when resources are available.

In order to provide more accurate, effective fish consumption advisories that reduce regionally specific exposure pathways, clear, targeted education and locally-based advisories should be designed. When possible, target audience members should be involved in the process of crafting and disseminating educational materials. More realistic advisories can be created by basing monitoring and advisory decisions on regional species-specific sportfish consumption levels, not just on contaminant levels alone. Providing clear, culturally tailored health messages regarding fish advisories will promote more informed choices about fish consumption that will minimize potential exposures to environmental pollutants.

Summaries of Fish Consumption Source materials

North Carolina

Bawden et al. (2015): The University of North Carolina (UNC) has been seeking community input on fish consumption advisory educational materials in order to educate

recreational anglers and their families about a fish consumption advisory (FCA) related to PCBs. Despite existing educational materials on PCBs, community partners are concerned that many people take home their catch. Research has found that FCAs alone are ineffective at reaching recreational anglers and people who eat fish. It has also found that when FCA messages do reach their target audiences, people do not always trust, understand, or follow them. UNC is working to involve target audience members in the process of crafting and disseminating FCA educational materials, and to evaluate their community-based fish consumption education programs.

They found that minority participants and participants for whom English is not their first language were initially more likely to believe the fish were “somewhat safe” to “very safe” to eat. They were more likely to report consuming fish caught from contaminated locations and to express incorrect info about the health risks posed by contaminated fish. After reading their educational guide, people reported that consuming fish from the contaminated waters to be less safe than before they read the guide. They also recognized that children, and women who are pregnant or breastfeeding, should avoid eating fish from the contaminated waters.

Challenges endured in this study included reaching target populations, educating about carrying advisories at multiple locations with multiple contaminants, and overcoming social desirability bias.

UNC collaborated with several organizations, including the NC Department of Public Health, Neuse Riverkeeper Foundation, and the NIEHS-funded Center for Human Health and the Environment at NCSU.

LePrevost et al. (2013): This study examined the efficacy of a sign designed by the North Carolina Division of Public Health posted along a reservoir (Badin Lake) for increasing anglers’ awareness of a fish consumption advisory, with a particular focus on anglers who share their catch with women and children. Shore anglers were significantly less likely to be aware of the term “fish consumption advisory” and of the specific advisory for Badin Lake than boat anglers. The study’s findings underscore differences in fish consumption advisory awareness among subpopulations. It also revealed the importance of characterizing the communication needs of shore anglers and anglers who share their catch with sensitive populations for the creation of more targeted communications of fish consumption advisories.

South Carolina

Ellis et al. (2014): Research suggests that African-American fishers in the southeast US consume larger amounts of fish, potentially exposing them to higher environmental contaminant levels. An in-depth study focused on South Carolina's Gullah/Geechee heritage and African-American Sea Island attitudes, perceptions, and cultural beliefs about fishing in one urban and two rural South Carolina coastal. Results indicated that study participants in rural counties had slightly different perspectives of fishing, i.e. fishing as an essential dietary supplement, than in urban counties where fishing was viewed more as relaxation. Major misconceptions existed in all counties between fish consumption advisories related to pollution versus harvesting restrictions association with fishing regulations. Both urban and rural fishers exhibited confusion between fishing regulations and fish advisories. Providing clear, culturally tailored health messages regarding fish advisories will promote more informed choices about fish consumption that will minimize potential exposures to environmental pollutants.

Florida

Krimsky et al. (2015): To address the need for consumer-oriented education, these investigators conducted a survey of Florida seafood consumer preferences, perceptions, and concerns. The majority of respondents who do consume seafood eat it one to two times per week. This pattern is consistent with a 2007 Florida Seafood Study conducted by the Florida Department of Agriculture and Consumer Services (FDACS), which suggests that Floridians consume seafood more frequently than the national average. Based on the results of this study, the following suggestions for seafood educational programs were made:

- Educational materials should provide info on low-cost and seasonal options for Florida seafood commodities to address the fact that higher cost of seafood may be becoming a barrier to increased consumption.
- Educational programs could focus on developing a “train-the-trainer” model for restaurants and retail staff in order to help workers better address customer questions and needs regarding purchasing local seafood.
- General knowledge about seafood is low for Florida consumers, especially regarding the safety of imported seafood. The University of Florida and the Florida Cooperative Extension Service, both of which are recognized as respected outlets for seafood information, have an opportunity to address these gaps.

- Educational programs should utilize appropriate outreach materials, including both traditional (brochures) and non-traditional (internet, social media) strategies.

Schaefer et al (2014): Recent research has demonstrated higher seafood consumption and subsequent increased risk of methylmercury exposure among subpopulations living in coastal areas. Since the study found that mercury contamination is generally higher in Florida compared to all other states, targeted education and local advisories should be designed to reduce regionally specific exposure pathways. Future local consumption advisories may include several of the species identified in this study, particularly for pregnant women. However, there are many well-recognized benefits of fish consumption. The challenge for public health is to find and recommend the balance between the positive and negative effects of fish and shellfish consumption. The findings of high concentrations of mercury in hair among coastal residents in eastern Florida associated with consumption of locally caught seafood and specific species of fish should be used to develop interventions to reduce exposure among high risk groups.

Mississippi

EPA (2010): EPA's Office of Water, Office of Science and Technology designed and conducted a survey for assessing the awareness and effectiveness of the Mississippi Delta fish consumption advisory issued by the Mississippi Department of Environmental Quality (MDEQ) in 2001. The state-issued advisory recommends that people should not eat more than two meals a month of wild-caught buffalo fish, carp, gar, and large catfish and should not eat any buffalo fish from Roebuck Lake. MDEQ initiated an extensive outreach campaign in 2001 to promote awareness of the advisory by conducting a public media campaign, distributing letters and posters to stores, posting signs at fishing access points, and mailing letters and brochures to churches in the Delta area. They also implemented some aspects of the risk communication outreach campaign, including publishing advisories in the Mississippi Department of Wildlife, Fisheries, and Parks' regulations brochure, posting information on the MDEQ website, and maintaining signs at boat ramps and fishing areas.

The survey results suggested that some respondents, 33-54%, stopped eating or ate less wild-caught large catfish or buffalo fish since learning about the advisory (few ate carp or gar before the advisory). Respondents reported limited changes in their fishing practices and fish preparation and cooking practices since learning about the advisory. Only 10% were found to eat more than the recommended two fish meals per month of wild-caught fish from the Delta area, which would increase their health risks from

consuming DDT and toxaphene contaminated fish. About a third of respondents reported eating buffalo fish or wild-caught large catfish.

Louisiana

Katner et al. (2011): This was the first known population-based survey of recreational fishers in Louisiana (n = 1774). The ultimate goal of the study was to obtain data in support of the development of regional advisories for a high exposure population with unique seafood consumption patterns. A survey was mailed to a random sample of licensed recreational fishers to characterize local fishing habits, sportsmen consumption, and advisory awareness. Eighty-eight percent of respondents reported eating sportfish. Respondents ate an estimated mean of four fish meals per month, of which, approximately half were sportfish. Over half of all sportfish meals (54%) were caught in the Gulf of Mexico or bordering brackish areas. Sportfish consumption varied by license and gender; the highest was among Sportsman's Paradise license holders and males. Advisory awareness rates varied by gender, ethnicity, geographic area, license type, age, and education. Results were used to identify ways to optimize monitoring, advisory development, and outreach activities.

Lincoln et al. (2011): Methyl mercury exposure assessments among average fish consumers in the US may underestimate exposures among US subpopulations with high intakes of regionally specific fish. The study examined relationships among fish consumption, estimated mercury intake, and measured mercury exposure within recreational anglers in Louisiana. Forty percent of participants had levels >1 ug/g, which approximately corresponds to the US EPA's reference dose. Study participants had relatively elevated hair mercury concentrations and reported consumption of a wide variety of fish, particularly locally caught fish. This group represents a highly exposed subpopulation with an exposure profile that differs from fish consumers in other regions of the US, suggesting a need for more regionally specific exposure estimates and public health advisories.

Gulf Coast

Natural Resources Defense Council (2010): The NRDC conducted a Gulf Coast Seafood Consumption Survey after the BP Deepwater Horizon spill in response to the FDA's protocol for determining seafood safety. The protocol guided the reopening of more than 99% of Gulf waters to fishing. The protocol included several assumptions that were questioned by scientists and Gulf Coast residents. The FDA derived its seafood consumption rates from national rather than local data.

The survey found elevated rates of seafood consumption among the Gulf Coast residents surveyed. Rates of shrimp consumption significantly exceeded the estimate used by the FDA to calculate a safe level of exposure to oil spill-related contaminants—ranging from 3.6 to 12.2 times higher. Some subpopulations reported significantly higher seafood consumption rates than other survey respondents and the FDA estimates. Also, many survey respondents are more vulnerable to contaminants in seafood than FDA accounted for due to smaller body weight. When coupled with increased consumption rates, this can result in a significantly increased dose of contaminants.

Comparative analysis of state fish consumption advisories targeting sensitive populations

Scherer et al. (2008): The study conducted a comparative analysis of advisory websites issued by states to assess health messages that sensitive populations might access. The findings highlight the complexity of assessing and communicating info about multiple contaminant exposure from fish consumption. Communication regarding potential health benefits conferred by specific fish nutrients was minimal and focused primarily on omega-3 fatty acids. The overview highlights a lack of both clarity and consistency in providing the breadth of information that sensitive populations such as pregnant women need to make public health decisions about fish consumption during pregnancy.

Will EPA consider the patterns and importance of fish consumption as an exposure for recreational and subsistence anglers in the Brunswick area?

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Dioxin Literature Review

2011-2015 Literature Search

ESC conducted a scientific literature search on the most recent (2011-2015) dioxin toxicity studies. We also include literature search results from a similar effort completed several years ago for years through 2010, appended at the end of the more recent search.

How does EPA plan to implement the information found in these studies, especially carcinogenicity, into the remediation of the site?

What are the Preliminary Remediation Goals (PRGs) at the site for dioxins/furans in sediment, water, and fish tissue? The Lower Duwamish Waterway Superfund Site created a PRG for surface water for PCB contamination, which became a cleanup level for surface water in the Record of Decision. **Will EPA complete similar action decisions for the Terry Creek OU 1 site for toxaphene, dioxins and furans?**

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Previous to 2011 Dioxin/Furan Literature Search:

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