

## **Appendix C**

APPENDIX C  
Letter

December 5, 2003

December 5, 2003 Letter  
GEORGIA PACIFIC/RICE CREEK

Dear :

This letter is in response to your letter dated March 18, 2002 petitioning ATSDR to conduct a public health assessment for fish testing from Rice Creek near the Georgia Pacific site in Palatka, Florida. To expedite our response, we will share the most recent fish results with you now. A health consultation report will be forthcoming. However, it will take several more months to prepare, go through reviews and finalize.

From November 2002 through July 2003, the Florida Department of Health's (DOH) Bureau of Community Environmental Health reviewed and approved fish protocols and sampling plans, attended numerous teleconferences and coordinated the fish collection with the Florida Department of Environmental Protection (DEP) in Jacksonville and Georgia Pacific's contractor.

In July 2003, Georgia Pacific's contractor collected bluegill and white catfish from Rice Creek at both upstream (at the point of discharge) and downstream sites. The Florida DOH attended some of the upstream fish sampling. The contractor's fish collection and sampling time from the creek was adequate. Only the largest and oldest fish were sent to the laboratory for analyses (48 total). Alta Analytical Perspectives Laboratories in North Carolina filleted, composited, homogenized and analyzed four samples of the collected fish (12 upstream catfish, 12 downstream catfish, 12 upstream bluegill and 12 downstream bluegill).

In October 2003, the Florida DOH received the Annual Fish Tissue Dioxin Monitoring report and fish data from DEP and Georgia Pacific. Please see the enclosed map showing the fish sampling locations. Also, a table summarizing the fish data from upstream and downstream locations of Rice Creek is enclosed.

After reviewing these fish data, the Florida DOH determined the calculated dioxin toxicity equivalents (TEQ) levels found in the bluegill and catfish are well below our guideline of 7 parts per trillion (ppt) and are therefore not likely to cause illness. Therefore, we are not recommending additional fish sampling at this time and are not issuing a fish advisory for Rice Creek.

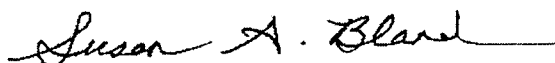
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Your other concerns regarding a fish-sampling program for the St. Johns River, disposal of dioxin sludges and remediation of dioxin sediments are all environmental issues handled by the Florida DEP. If you are still awaiting a response to these concerns, please contact Kim Pearce at DEP in Jacksonville at (904) 807-3327.

If you have any questions or need additional information, please call me at (850) 245-4444 ext. 2310.

Sincerely,



Susan Ann Bland  
Biological Scientist  
Bureau of Community Environmental Health

SAB

Enclosures

cc: Leslie Campbell, ATSDR  
Debra Gable, ATSDR  
Allen Robinson, ATSDR  
Linda Greer, NRDC  
Kim Pearce, DEP/Jacksonville  
Bob Safay, ATSDR  
Laurey Gauch, Putnam CHD

## **Appendix D**

Jeb Bush  
Governor



John O. Agwunobi, M.D., M.B.A.  
Secretary

APPENDIX D  
Letter

December 29, 2003

December 2003  
GEORGIA PACIFIC/RICE CREEK

Dear

This letter is in response to your emails dated December 9, 10 and 11, 2003 regarding the July 2003 fish testing from Rice Creek near the Georgia Pacific site in Palatka, Florida. As stated in our December 5 letter to you, the Florida Florida Department of Health (DOH) will not issue a fish advisory for Rice Creek or post signs limiting consumption. The levels found in the fish are not a public health threat.

As we discussed on the phone on December 9, 2003, the Florida DOH uses the Toxicity Equivalent (TEQ) of 7 parts per trillion (ppt) for dioxins in fish. This number is protective of human health. The Florida DOH issues fish advisories when the dioxin TEQ exceeds 7 ppt. We are aware of the Environmental Protection Agency's (EPA) draft proposed guidance dated September 1999 including 1.2 ppt TEQ for dioxins in fish.

In your emails you asked why the Florida DOH currently uses 7 ppt as our dioxin standard. This is not a Food and Drug Administration (FDA) guideline. FDA does not have an action level for dioxins in fish. The 7 ppt dioxin standard was the EPA standard in 1990 when HRS (now DOH) set its current level for dioxin. The Florida DOH will continue to use 7 ppt until our re-evaluation of the dioxin standard is completed late in 2004. The EPA Scientific Advisory Panel has questioned the scientific basis of the EPA guidelines. EPA has requested the National Academy of Science do a detailed review of the EPA dioxin toxic equivalent and risk assessment documents. This is expected to take until late 2005.

The highest TEQ found in tested fish from the July 2003 sampling event was 0.51 ppt. This level is significantly less than DOH's 7 ppt guideline. Anything less than 7 ppt is protective of human health. In addition, the calculated doses for dioxins and furans for each fish species were less than the Agency for Toxic Substances and Disease Registry (ATSDR's) Minimum Risk Level (MRL) for 2,3,7,8-tetrachlorodibenzo-*p*-dioxin (2,3,7,8-TCDD). An MRL is an estimate of daily human exposure to a dose of a chemical that is likely to be without an appreciable risk of adverse noncancerous effect over a specified duration of exposure. The Florida DOH used the MRL for 2,3,7,8-TCDD as this congener is the most toxic of all the dioxins and furans. Using the highest

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TEQ value of the two fish species (0.51 parts per trillion or ppt), our estimate of a child's and an adult's maximum acute (1-14 days) exposure to 2,3,7,8-TCDD from eating the fish from Rice Creek is 150,000 times less than the ATSDR's MRL. Our estimate of a child's and an adult's maximum intermediate (15-364 days) exposure to 2,3,7,8-TCDD from eating fish from the creek is 150 times less than the ATSDR's MRL. Our estimate of a child's and an adult's maximum long-term ( $\geq 365$  days) exposure to 2,3,7,8-TCDD from eating fish from the creek is slightly less than the ATSDR's MRL.

In your December 10, 2003 email, you requested FDOH evaluate dioxins in bass if collected using another contractor. We do not think this is necessary for several reasons. First, largemouth bass were not analyzed from Rice Creek because they only come into the creek intermittently. Therefore, bluegill is the better predator for analyses for this creek. The dioxin level found in Rice Creek bluegill from earlier testing was higher than the dioxins found in Rice Creek largemouth bass.

Secondly, the July 2003 fish-sampling event collecting bluegill and catfish from Rice Creek was complete. The amount and types of fish collected and the sampling times were adequate for this creek. The Florida DOH did not see any fisherpersons while the contractors were collecting fish. The electro-fishing procedure stuns fish to the surface so fish are collected more easily than for a regular fisherperson. Therefore, for these above reasons, we do not recommend any further fish testing (including bass) for dioxins from Rice Creek at this time.

In response to your December 11, 2003 email, we do not have a deadline or address for public comment for the EPA's latest dioxin document. Please call Jeff Bigler with EPA in Washington, D.C. at (202) 566-0389 for this information.

Also in response to your December 11, 2003 email, it is common for fish in Florida to contain low levels of dioxins. Dioxins build up over time as they age. During the July 2003 investigation older fish were collected specifically for this reason.

Please contact Kim Pearce with the Department of Environmental Protection (DEP) at (904) 807-3327 to address sediment concerns. However, please keep in mind that if sediment samples are collected, and the FDOH evaluates dioxins in sediments, the evaluation may be indeterminant. For a public health determination, dioxin testing in fish is more meaningful as people are likely to eat the fish, but not likely to make contact with the sediments.

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If you have any questions or need additional information, please call me at (850) 245-4444 ext. 2310.

Sincerely,

Susan Ann Bland  
Biological Scientist  
Bureau of Community Environmental Health

SAB

cc: Leslie Campbell, ATSDR  
Debra Gable, ATSDR  
Allen Robinson, ATSDR  
Linda Greer, NRDC  
Kim Pearce, DEP/Jacksonville  
Bob Safay, ATSDR  
Laurey Gauch, Putnam CHD

DEC-10-03 12:06 From:

T-342 P.04/06 Job-445

Linda Greer, Ph.D.  
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will also be used to prepare a Health Consultation report as part of the cooperative agreement between the DOH and the ATSDR.

Again, thank you for your interest and for sharing your concerns with me. If you have any additional questions or comments, please contact Dr. Joe Sekerke in the Bureau of Community Environmental Health at (850) 245-4248.

Sincerely,



John O. Agwunobi, M.D., M.B.A.  
Secretary, Department of Health

JOA/js