Health Consultation

Public Health Evaluation of Fish Contaminant Data in the Housatonic River

LAKE ZOAR, LAKE LILLINONAH, WEST CORNWALL, AND BULL'S BRIDGE IN KENT, CONNECTICUT

JULY 8, 2008

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Public Health Service
Agency for Toxic Substances and Disease Registry
Division of Health Assessment and Consultation
Atlanta, Georgia 30333

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HEALTH CONSULTATION

Public Health Evaluation of Fish Contaminant Data in the Housatonic River

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Prepared By:

Connecticut Department of Public Health Under cooperative agreement with the Agency for Toxic Substances and Disease Registry The conclusions and recommendations in this health consultation are based on the data and information made available to the Connecticut Department of Public Health (CTDPH) and the Agency for Toxic Substances and Disease Registry (ATSDR). CTDPH and ATSDR will review additional information when received. The review of additional data could change the conclusions and recommendations listed in this document.

BACKGROUND AND STATEMENT OF ISSUE

The Housatonic River is approximately 149 miles long, beginning in the Berkshire mountains in western Massachusetts and flowing south, through western Connecticut into the Long Island Sound (Appendix A). Its major tributaries are the Williams, Green and Konkapot Rivers in Massachusetts, the Tenmile River in New York, and the Shepaug, Pomperaug, Naugatuck, and Still Rivers in Connecticut. It receives the Naugatuck River at Derby, Connecticut, and the Still River south of New Milford, Connecticut. The General Electric (GE) facility, which produced and handled polychlorinated biphenyls (PCBs) from the 1930s to 1977 in its Pittsfield, Massachusetts facility, caused significant contamination of Housatonic River sediments and fish in the Massachusetts portion of the river. PCB-contaminated sediments have been transported into the Connecticut portion of the river over the years. This has resulted in fish becoming contaminated with PCBs to the extent that fish consumption advisories have been in place in several parts of the Housatonic River in Connecticut since 1977. The Patrick Center for Environmental Research, Academy of Natural Sciences of Philadelphia (Philadelphia Academy) samples fish in the Housatonic River for GE on a biennial basis and reports this information to the Connecticut Department of Public Health (CTDPH) and Connecticut Department of Environmental Protection (CTDEP) Fisheries Program. The sampling locations were chosen in the 1970s and remain in place for the purpose of evaluating temporal trends. CTDPH reviews new fish tissue data sampled by the Philadelphia Academy from the Housatonic River biennially and evaluates whether the current fish consumption advisory needs to be modified to protect public health based on the level of PCB contamination. This sampling program has been in place since 1984 (EPA 2005). CTDPH has evaluated fish sampling data from 2006 and the results of this evaluation are the focus of this document.

Demographics

Since the area surrounding the Housatonic River in Connecticut is very large, the demographics described here include only the towns surrounding the five stations where fish sampling occurred: West Cornwall, Bull's Bridge in Kent, Fall's Village, Lake Zoar, and Lake Lillinonah (Appendix A). As seen in Table 1, some of the nearby populations are large because the Lakes are surrounded by several towns. However, this is a very conservative estimate of a population that may be affected. We do not expect a large number of people to fish in these five sampling areas along the Housatonic River.

The Housatonic River is a popular fishing destination for people across all of Connecticut and even for people from out of state. Therefore, these demographics for local towns do not necessarily reflect the true nature of the people fishing on the river.

Table 1. Demographics for Fish Sampling Locations along the Housatonic River

Sampling Station	Surrounding Towns	Total Population	Area (square miles)
West Cornwall	West Cornwall	1,434	46
Bull's Bridge	Kent	2,858	50
Fall's Village	Fall's Village	1,052	33
Lake Zoar	Monroe, Oxford, Newtown, Southbury	72,666	194.39
Lake Lillinonah	Brookfield, Bridgewater, Newtown, Southbury, New Milford	88,207	156.02

United States Census Bureau 2000

Health Comparison Values and Fish Tissue Contaminant Levels

In August and October 2006, thirty brown trout were sampled from West Cornwall and analyzed for PCB content as part of the Housatonic River's biennial fish monitoring program described previously. In addition, 40 smallmouth bass from the four stations along the Housatonic River (West Cornwall, Bull's Bridge, Lake Zoar, and Lake Lillinonah) were also sampled. Lastly, twenty northern pike from four stations (Bull's Bridge, Fall's Village, Lake Lillinonah, and Lake Zoar) were sampled. All of the fish fillets (brown trout, northern pike, and smallmouth bass) contained PCB levels that exceeded CTDPH's Modified Great Lakes Protocol PCB value for fish consumption which is described below (Patrick Center for Environmental Research 2007).

1. Health Comparison Values

In order to set safe levels of PCBs in fish, CTDPH uses a modified version of the Protocol for a Uniform Great Lakes Sport fish Consumption Advisory (GLP) (1993). The GLP is a framework for setting risk-based fish consumption advisories in the Great Lakes states. Using the GLP, the Great Lakes Task Force developed a Health Protective Value (HPV) for PCBs of 0.05 µg/kg/day by using a "weight of evidence" approach which considered all of the existing toxicological values and studies (mostly human and monkey). The "weight of evidence" approach differs from a reference dose which typically uses a single critical study. The HPV is a unique value developed specifically for the Great Lakes sport fish advisory process. The development of the HPV was based on some key assumptions: average meal size for a 70 kg adult of one-half pound (227 grams) and a 50% reduction in PCB fish fillet content (skin on, scales off fillet) through

trimming and cooking losses of fatty portions of the fish. The goal of the advisory program was to limit PCB exposure to 3.5 μ g/day (0.05 μ g/kg/day *70 kg = 3.5 μ g/kg/day). At this exposure level, cancer risks would not be expected to exceed 1 excess cancer in 10,000 exposed people and non cancer health effects would not be likely.

Concerning non-cancer health effects, there are several animal and human studies that resulted in a variety of adverse health effects from exposure to PCBs. The main effects from exposure to PCBs in animals include hepatic, dermal, immunological, and neurobehavioral development. Because the most sensitive effects are immunological and neurobehavioral development, the GLP Task Force tended to weigh more heavily on these studies when developing its HPV (Great Lakes Sport Fish Advisory Task Force 1993).

Cancer risks associated with the HPV were evaluated using a Cancer Slope Factor (CSF) of 2 (mg/kg/day)⁻¹. If a population were exposed to PCB levels of 0.05 µg/kg/day (HPV) every day for 70 years (a lifetime), there would be a theoretical excess cancer risk of 1 person in a population of 10,000. This theoretical excess cancer risk is on the upper end of a generally acceptable range (1 in 10,000 to 1 in 1,000,000). The cancer slope factor of 2 (mg/kg/day)⁻¹ is derived from rat studies resulting in liver cancer from oral exposure to PCBs.

CTDPH's version of the GLP takes into account detection limit issues and the somewhat greater concern for higher risk individuals (Ginsberg and Toal, 1999). CTDPH allows for unlimited consumption at PCB levels up to 0.1 ppm (parts per million), the point where practical quantification of PCBs in fish becomes certain whereas the GLP allows unlimited consumption only up to 0.05 ppm.

High risk individuals include pregnant women, women planning to become pregnant within a year, breastfeeding women, or children under the age of six. Pregnant women or women planning to become pregnant are particularly sensitive because PCBs can be passed through the mother to the unborn fetus and can result in central nervous system (CNS) effects as well as others. Children under the age of six are also particularly vulnerable because they tend to eat more per body weight. In addition, the developing organs (brain and thyroid gland) of children can sustain permanent damage if exposure to PCBs occurs during critical growth stages. Breastfeeding women are also in the high risk group because PCBs can pass through breast milk and expose young children to PCBs. Low risk individuals include the remaining population. Table 2 gives the details of CTDPH's fish consumption advisory as it relates to PCB levels in fish samples.

Regarding the issue of higher risk individuals, the animal toxicology studies support an HPV that is in the same range for reproductive and other (immunological, dermal) endpoints. This suggests that in utero development is no more sensitive to PCBs than are endpoints seen in adult animals. However, the evidence of low dose effects in humans is strongest for in utero effects (central nervous system development). This creates a somewhat greater concern for pregnant women and women planning pregnancy. Additionally, while the cumulative PCB dose from long-term exposure may be the most

critical determinant for immunological or dermal effects, the period of exposure needed for in utero effects is uncertain. Monkeys exposed to low doses of PCBs during prepregnancy over several years resulted in adverse health effects among offspring. Therefore, it is uncertain whether the accumulation of maternal PCB body burden prior to and during pregnancy is critical or a relatively short exposure period (during pregnancy) could also produce low dose developmental effects (Ginsberg and Toal 1999). Two short term studies in mink and rats also resulted in low dose developmental effects from exposure to PCBs. Therefore, CTDPH believes that there may be a greater sensitivity during in utero exposure such that recent exposures that do not involve a cumulative body burden (which is important to adult toxicity) could produce an adverse health effect. This uncertainty over PCBs pharmacokinetics and developmental outcomes supports a prudent avoidance (do not eat) approach for pregnant women for markedly elevated PCB concentrations (e.g. over 1 ppm). CTDPH's recommendation of "do not eat" for high risk groups for PCB levels in fish of 1.1-1.9 ppm differs from the GLP's approach which recommends a "1 meal per 2 months" restriction for fish consumption for all risk groups for PCB levels of 1.1-1.9 ppm (Ginsberg and Toal 1999). In addition, CTDPH's recommendation also differs from the GLP's approach which recommends a "one meal per week" restriction for all risk groups for PCB levels of 0.06-0.20 ppm (Table 2).

When using the HPV, setting limits based on cancer risk less than 1 in 10,000 would lead to virtually no fish consumption (local or commercial) due to the widespread occurrence of low levels of PCBs in fish. This would result in the benefit of fish consumption to be lost in the interests of minimizing cancer risks. Given that number of frequent consumers of locally caught fish in Connecticut may not large, the theoretical 1 in 10,000 cancer risk is of less concern than if this were a population-wide exposure (Ginsberg and Toal 1999). Therefore, CTDPH and The Great Lakes Protocol focus on prevention of non-cancer health effects of PCBs.

Table 2. CTDPH's Modified Great Lakes Protocol for Fish Consumption

PCB Level (ppm*)	Consumption Advisory			
	Low Risk [#]	High Risk [®]		
< 0.1	Unlimited Consumption	Unlimited Consumption		
0.1-0.2	One meal per week	One meal per month		
0.21 - 1.0	One meal per month	One meal per month		
1.1 - 1.9	One meal every 2 months	Do not eat		
> 1.9	Do not eat	Do not eat		

⁽Ginsberg and Toal, 1999)

2. Fish Contaminant Levels

The 2006 contaminant data show that average PCB concentrations in all of the fish fillets from the five Housatonic River sampling locations were above the concentration limit for

^{*}Parts Per Million

[#] Includes pregnant women, women planning to become pregnant within a year, nursing women, and children under 6 years old

[®]Includes all other groups not included in the low risk group

unlimited consumption (0.1 ppm). Average PCB levels in smallmouth bass tended to be lower in Lake Lillinonah and Lake Zoar than in West Cornwall and Bull's Bridge. Average levels in northern pike tend to be lower in Lake Lillinonah and Bull's Bridge than in Lake Zoar and Fall's Village. Table 3 gives the average congener-based PCB concentrations in five locations along the Housatonic River in the 3 fish species sampled in 2006.

Smallmouth Bass

The average PCB concentrations for Lake Lillinonah and Lake Zoar in smallmouth bass were 0.35 and 0.58 ppm, respectively, while the averages for West Cornwall, and Bull's Bridge were higher at 0.89 and 1.08 ppm, respectively, for the same species.

Brown Trout

Thirty brown trout were only sampled at the West Cornwall sampling station. The average PCB concentration in this fish species was 1.21 ppm.

Northern Pike

The average PCB concentration in northern pike in Lake Lillinonah and Bull's Bridge was 0.89 and .77 ppm, respectively, while the averages were higher for Fall's Village and Lake Zoar at 1.27 and 1.33 ppm, respectively, for the same species.

¹ The congener-based analysis method sums the concentrations of all individual congeners (up to 121) quantitated by the analytical method.

Table 3. PCB Concentrations in Three Species of Fish Caught in Five Locations

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Location	Species	Number of Samples	Number of Individuals	Average (Congener*) PCBs (ppm^) in 2006	Range (Congener Based) PCB (ppm)
West	Smallmouth				
Cornwall	Bass	10	10	0.89	0.51-1.83
Bull's	Smallmouth				
Bridge	Bass	10	10	1.08	0.43-1.71
Lake	Smallmouth				
Lillinonah	Bass	10	10	0.35	0.24-0.49
Lake Zoar	Smallmouth				
	Bass	10	10	0.58	0.16-2.25
West					
Cornwall	Brown Trout	30	30	1.21	0.43-3.86
Fall's	Northern				
Village	Pike	5	5	1.27	0.54-0.1.64
Bull's	Northern				
Bridge	Pike	5	5	0.77	0.42-1.22
Lake	Northern				
Lillinonah	Pike	5	5	0.89	0.35-1.43
Lake Zoar	Northern				
	Pike	5	5	1.33	0.70-3.02

^{*}The congener-based analysis method sums the concentrations of all individual congeners (up to 121) quantitated by the analytical method.

3. Time Trends

It is also informative to evaluate trends in contaminant levels in fish tissue over time. Table 4 gives the trend over time for average PCB contamination in the five locations in all 3 species of fish sampled. The average PCB levels have decreased greatly in all of the locations from a high of 10.01 ppm in Fall's Village in northern pike in 2004^2 to a low of 0.28 in smallmouth bass in Lake Zoar in 2004. Overall, there has been a large decrease in PCB levels in all of the locations from the 1980's to the mid 1990's and the PCB levels in some fish have now stabilized.

[^]Parts per Million

² It is important to note that northern pike have only been sampled twice and therefore, not long enough to indicate a real trend like the other fish sampled.

4. Data Evaluation Issues

In calculating average congener-based PCB concentrations, CTDPH used average concentrations for each species and sampling location rather than 95% upper confidence limits (UCLs). A 95% UCL provides a conservative estimate of the average concentration and is unlikely to underestimate the "true" average. However, there is a tendency to sample larger fish (an intentional bias) in the Housatonic River Sampling Program which is the source of the data used in this health consultation This provides conservatism because larger fish tend to have higher PCB concentrations. For this reason, CT DPH decided that it was not necessary to calculate 95% UCLs. CTDPH is confident that the average PCB concentrations provide a conservative estimate of the "true" average.

Table 4. PCB Level History along the Housatonic River in Five Locations in 2006

Location	Fish Species	Highest	Average	Average
		Average	(Congener	(Congener Based)
		(Congener	Based) PCBs	PCBs (ppm) in
		Based [#]) PCBs	(ppm) (Previous	2006
		1984-2004	Year Sampled)	
		(ppm [@])		
		(Year)		
West	Smallmouth			
Cornwall	Bass	3.77 (1988 [*])	0.99 (2004)	0.89
Bull's	Smallmouth			
Bridge	Bass	2.33 (1988)	1.05 (2004)	1.08
Lake	Smallmouth			
Lillinonah	Bass	1.41 (1992)	0.53 (2004)	0.35
Lake Zoar	Smallmouth			
	Bass	1.13 (1992)	0.28 (2004)	0.58
West	Brown Trout			
Cornwall		7.25 (1992)	1.64 (2004)	1.21
Fall's	Northern			
Village	Pike	NPS [^]	10.01 (2004)	1.27
Bull's	Northern			
Bridge	Pike	NPS	0.45 (2004)	0.77
Lake	Northern			
Lillinonah	Pike	NPS	1.09 (2004)	0.89
	Northern			
Lake Zoar	Pike	NPS	NPS	1.33

[#]The congener-based analysis method sums the concentrations of all individual congeners (up to 121) quantitated by the analytical method.

[@]parts per million

^{*} Results for 1984-1990 were estimated by the Patrick Center for Environmental Research (2007) from aroclor-based data using regressions of the natural logarithm (ln) of the congener-based PCB concentration versus the ln of the aroclor-based PCB concentration of each fish species that were established with data from 1992 and 1994. The aroclor-based analysis method is a measurement of commercial mixtures of PCB compounds. Congener analysis was not measured before 1992.

^Not previously sampled.

DISCUSSION

Exposure Pathway Analysis

To evaluate potential exposures to the contaminated fish in the Housatonic River and its Lakes, CTDPH evaluated the fish tissue data and considered how people may come into contact with contaminants in the fish. The possible pathways of exposure are by ingestion (eating) the fish.

Environmental data show that fish in the 5 locations sampled along the Housatonic River and its Lakes (Zoar and Lillinonah) are contaminated with PCBs. Individuals who catch and eat fish in these water bodies would likely be exposed to PCBs in the fish fillets. In addition, their families would also be exposed to PCBs if they eat the fish.

Public Health Implications for Adults and Children

When determining the public health implications of exposure to hazardous contaminants, CTDPH considers how people might come into contact with contaminants and compares contaminant concentrations with health protective levels. When contaminant levels are below health-based comparison values, health impacts from exposure to those levels are unlikely. Contaminant levels exceeding comparison values do not indicate that health impacts are likely, but instead warrant further investigation. In this health consultation, CTDPH used a modified Great Lakes Protocol for fish consumption to set a health protective value (HPV) for PCBs in fish as described in the Environmental Contamination section of this document. As stated previously, this modified protocol is a risk-based protocol which takes into account detection limit issues and the somewhat greater concern for higher risk individuals.

Ingestion of three species of fish in the upper part of the Housatonic River and its Lakes which contain elevated levels of PCBs is a completed exposure pathway and is evaluated in this health consultation. Using CTDPH's Modified Great Lakes Protocol for Fish Consumption, we have classified each fish species according to its appropriate consumption category. CTPH has concluded that the three fish species from Lake Lillinonah, Lake Zoar, Bull's Bridge, Fall's Village, and West Cornwall contain elevated PCB levels where adverse health effects from ingestion of these fish can not be ruled out. Ingestion of these fish present a public health hazard to individuals who do not follow the consumption advisory. However, if community members adhere to the current consumption advisory, exposure to PCBs in fish would not be significant enough to cause adverse health effects. CTDPH believes that this updated consumption advisory is necessary to protect public health while allowing community members to benefit from the nutritional advantages of eating fish.

Table 5 gives the updated CTDPH fish consumption advisory in response to the 2006 PCB data from the five sampling locations along the Housatonic River and compares it to the previous advisory.

1. Smallmouth Bass

Environmental data indicate the average PCB levels in smallmouth bass from all 4 stations are above the concentration limit for unlimited consumption according to CTDPH's modified Great Lakes Protocol for fish consumption (Table 2). The average PCB levels in Lake Lillinonah (0.35 ppm), and Lake Zoar (0.58 ppm), are within the "1 meal per month-everyone" restriction level (Table 2). However, average PCB levels in Bull's Bridge (1.08 ppm) and West Cornwall (0.89 ppm) which are located in the upper section of the Housatonic River are higher than in the two Lakes located further south. The average PCB levels in these 2 sampling stations located in the upper part of the Housatonic River border between "1 meal per month-everyone" consumption restriction and "1 meal per two months, high risk group-do not eat" consumption restrictions. Since the levels of PCBs over time in smallmouth bass have not dropped low enough to loosen the consumption advisory, the CT DPH advisory of "1 meal per month-everyone" will remain in the Lakes (Lillinonah, Housatonic, and Zoar) on the Housatonic River and "1 meal per month, do not eat-high risk" for the upper part of the Housatonic River.

In summary, CT DPH has decided to maintain the advisory at "1 meal per montheveryone" for the Lakes on the Housatonic River and "1 meal per month, do not eat-high risk" for the upper part of the Housatonic River for the following reasons:

- 1. Past fish sampling has indicated moderately high levels of PCB contamination on this river.
- 2. Further sampling is necessary to show that PCB levels in bass are low enough to allow more consumption.

2. Brown Trout

In 2006, brown trout in the West Cornwall station had an average PCB level (1.21 ppm) within the "1 meal per 2 months, do not eat-high risk" restriction level. CTDPH has decided to loosen the advisory from "do not eat-everyone" to "1 meal per 2 months/do not eat-high risk" for the following reasons:

1. Repeated rounds of sampling have shown that PCB levels in brown trout are consistently low enough to allow some consumption.

3. Northern Pike

2006 is the second year that PCB levels in northern pike were sampled. While levels from Bull's Bridge and Lake Lillinonah were within the "1 meal per month-everyone"

restriction level, PCB levels in Fall's Village and Lake Zoar, are higher and fall within the "do not 1 meal per 2 months/do not eat-high risk" consumption advisory action level of 1.1-1.9 ppm. Sampling results in 2004 from Fall's Village indicated very high levels of PCBs in northern pike which were in the "do not eat-everyone" consumption advisory.

Although the levels in the 2006 sampling round are generally lower than the previous round of sampling in 2004, CTDPH has decided to maintain the advisory of "do not eat-everyone" for the following reasons:

- 1. Past fish sampling has indicated very high levels of PCB contamination on this river. This relatively high average PCB concentration was due to one fish with very high levels of PCBs (30 ppm). CT DPH believes this particular fish does not represent the fish in the Fall's Village sampling station, but may have been a fish from the Pittsfield, Mass area. Even so, CT DPH has maintained an advisory based on these high PCB levels of "do not eat-everyone."
- 2. Further sampling is needed to more fully understand PCB levels in northern pike.

Table 5. Updated 2006 Advisory for Three Fish Species in the Housatonic River and its Lakes.

Location	Fish Species	Consumption Advisory	
		Previous	Updated
		(2007)	(2008)
Housatonic River above	Smallmouth Bass	1 Meal per 2	No Change
Derby Dam and its lakes		Months /Do	
(Lillinonah, Housatonic,		Not Eat –	
and Zoar)		High Risk	
		1 Meal per	No Change
		Month for the	
		Lakes	
	Brown Trout	Do Not Eat-	1 Meal per
	Brown Trout	Everyone	2 Months
		Liveryone	/Do Not
			Eat –High
			Risk
	Northern Pike	Do Not Eat-	No Change
		Everyone	

Includes West Cornwall, Fall's Village, and Bull's Bridge sampling locations.

EVALUATION OF COMMUNITY CONCERNS

The following is a list of general concerns that CTDPH has received in recent years through community meetings and inquiries from the public and community leaders:

1. I eat fish often in the Housatonic River. Why have I not gotten sick?

The PCBs present in fish in the Housatonic River are not present at levels that will make you acutely (immediately) sick. They are chronic toxins (i.e. they take a long time to cause an effect). The health effects of concern for PCBs are potential cancers and developmental problems in children/fetuses. PCBs accumulate in your body over time. The more PCB contaminated fish you eat, the greater the PCB levels that will build up in your body. PCB exposure is a particular concern

to pregnant women because the exposure their unborn child receives through the mother can cause development, behavioral, and learning problems in children.

2. I have eaten lots of fish from the Housatonic River. Is there medicine I can take to get rid of these chemicals?

There is no medicine or other procedure to get rid of the chemicals your body has accumulated from eating fish. The chemicals will very slowly leave your body over time. If you follow the advisory you will decrease your exposure and allow your body the time needed to reduce the levels of the chemicals.

3. Are there areas along the Housatonic River that have less contaminated fish?

The Housatonic River (below Derby Dam) as well as Lakes Lillinonah and Zoar are areas that are less contaminated. You can safely eat a greater amount of fish from these areas.

4. I am concerned that there are not enough signs along the river to alert people to this advisory. In addition, I am concerned that there may be a language barrier preventing people from understanding these signs.

Signs are posted by conservation officers at every access point along the Housatonic River. If you need more signs, then contact the CTDEP, Bureau of Natural Resources to request signs. Consumption advisory signs in other languages have been prepared and are posted in areas where these populations are thought to fish. Recently, more signs have been placed in these areas in response to this concern.

CONCLUSIONS

Three different fish species from five locations along the Housatonic River were found to have elevated levels of PCBs. CTDPH uses this fish tissue data to issue a general fish consumption advisory for the northern section of the Housatonic River above Derby Dam. The current PCB levels (based on 2006 data) are elevated enough to warrant a continued consumption advisory. However, a trend over time towards lower PCB levels throughout the Housatonic River and its Lakes in brown trout prompted CTDPH to loosen its consumption advisory from "do not eat-everyone" to "1 meal per 2 months /do not eat —high risk." A trend over time towards lower PCBs has been observed for the two other fish species (smallmouth bass and northern pike) sampled in all five locations, however, the levels have not decreased enough to loosen the consumption advisory. Therefore, CTDPH has not modified the consumption advisory in 2008 for these two fish species in these locations along the Housatonic River.

ATSDR has a characterization scheme whereby the level of public health hazard at a site is assigned to one of five conclusion categories (Appendix B). CTPH has concluded that three fish species from West Cornwall, Lake Lillinonah, Lake Zoar, Bull's Bridge, and Fall's Village present a public health hazard to individuals who do not follow the consumption advisory. If community members adhere to the current consumption advisory, exposure to PCBs in fish would not be significant enough to cause adverse health effects. CTDPH believes that this updated consumption advisory is necessary to protect public health while allowing community members to benefit from the nutritional advantages of eating fish.

RECOMMENDATIONS

- 1. CTDPH recommends that the Connecticut Department of Environmental Protection (CTDEP) and General Electric (GE) continue to work together with CTDPH on their biennial fish sampling plan for the Housatonic River.
- 2. CTDEP Fisheries and GE should continue to work with CTDPH to educate fishing populations along the Housatonic River about the consumption advisory.

PUBLIC HEALTH ACTION PLAN

Actions Taken

1. CTDPH along with CTDEP Fisheries and GE have worked together to educate both the general public as well as minority fishing populations along the Housatonic River about the consumption advisory as well as other populations along the river. CTDEP, Bureau of Natural Resources has posted signs along the river to inform the public about the consumption advisory.

2. As a result of the 2004 sampling results, CTDPH held a "Train the Trainer" session in May 2007 to educate leaders in the Housatonic River community about Connecticut's fish consumption advisory issues so that they will be able to educate other members of the community.

Actions Planned

- 1. CTDPH along with CTDEP and GE will continue to work together to educate the general public as well as minority fishing populations along the Housatonic River about the consumption advisory as well as other populations along the river.
- 2. CTDPH will update its Housatonic River fish consumption advisory in the spring of 2008 in response to the 2006 fish sampling data. The advisory will be printed in our annual brochure and distributed to towns and local health departments along the Housatonic River. In addition, CTDPH plans to restructure the brochure to make it easier to read and understand.
- 3. CTDPH plans to add questions to the CTDEP CREEL survey to gain information about the level of knowledge of the fish consumption advisory.
- 4. CTDPH is considering planning another "Train the Trainer" session in the future for the Housatonic River community.
- 5. CTDPH will continue to evaluate new fish contaminant data and will update its current Housatonic River fish consumption advisory as needed.
- 6. CTDPH will continue to review its fishing sampling protocol periodically and modify it as appropriate.

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CERTIFICATION

The Health Consultation for the Public Health Evaluation of Fish Contaminant Data in the Housatonic River, Lake Zoar, Lake Lillinonah, West Cornwall, Fall's Village, and Bull's Bridge in Kent, Connecticut was prepared by the Connecticut Department of Public Health under a cooperative agreement with the Agency for Toxic Substances and Disease Registry (ATSDR). It was completed in accordance with approved methodology and procedures existing at the time the health consultation was initiated. Editorial review was completed by the ATSDR Cooperative Agreement Partner.

Alan Grawford

Technical Project Officer

Division of Health Assessment and Consultation (DHAC) Agency for Toxic Substances and Disease Registry (ATSDR)

The Division of Health Assessment and Consultation (DHAC), ATSDR, has reviewed this health consultation and concurs with its findings.

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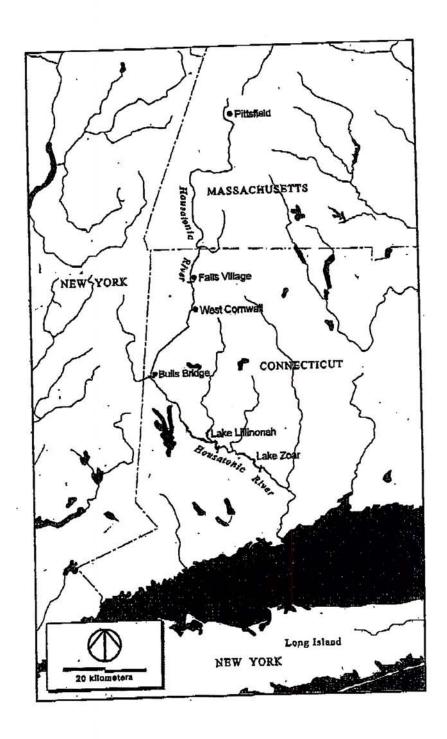
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Appendix A

Map of Sampling Locations along the Housatonic River



Appendix B. ATSDR Interim Public Health Categories

CATEGORY / DEFINITION	DATA SUFFICIENCY	CRITERIA
A. Urgent Public Health Hazard	This determination represents a professional judgement based on critical data	Evaluation of available relevant information* indicates that site-specific conditions or
This category is used for sites where short-term exposures (< 1 yr) to hazardous substances or conditions could result in adverse health effects that require rapid intervention.	which ATSDR has judged sufficient to support a decision. _{This} does not necessarily imply that the available data are complete; in some cases additional data may be required to confirm or further support the decision made.	likely exposures have had, are having, or are likely to have in the future, an adverse impact on human health that requires immediate action or intervention. Such sitespecific conditions or exposures may include the presence of serious physical or safety hazards.
B. Public Health Hazard	This determination represents a professional judgement based on critical data	Evaluation of available relevant information* suggests that, under site-specific
This category is used for sites that pose a public health hazard due to the existence of long-term exposures (> 1 yr) to hazardous substance or conditions that could result in adverse health effects.	which ATSDR has judged sufficient to support a decision. _{This} does not necessarily imply that the available data are complete; in some cases additional data may be required to confirm or further support the decision made.	conditions of exposure, long-term exposures to site-specific contaminants (including radionuclides) have had, are having, or are likely to have in the future, an adverse impact on human health that requires one or more public health interventions. Such site-specific exposures may include the presence of serious physical or safety hazards.
C. Indeterminate Public Health Hazard	This determination represents a professional judgement that critical data are	The health assessor must determine, using professional judgement, the "criticality" of
This category is used for sites in which "critical" data are insufficient with regard to extent of exposure and/or toxicologic properties at estimated exposure levels.	missing and ATSDR has judged the data are insufficient to support a decision. This does not necessarily imply all data are incomplete; but that some additional data are required to support a decision.	such data and the likelihood that the data can be obtained and will be obtained in a timely manner. Where some data are available, even limited data, the health assessor is encouraged to the extent possible to select other hazard categories and to support their decision with clear narrative that explains the limits of the data and the rationale for the decision.
D. No Apparent Public Health Hazard	This determination represents a professional judgement based on critical data which ATSDR considers sufficient to support a decision. This does not	Evaluation of available relevant information* indicates that, under site-specific conditions of exposure, exposures to site-specific contaminants in the past, present, or
This category is used for sites where human exposure to	necessarily imply that the available data are complete; in some cases	future are not likely to result in any adverse impact on human health.
contaminated media may be occurring, may have occurred	additional data may be required to confirm or further support the decision	
in the past, and/or may occur in the future, but the exposure	made.	
is not expected to cause any adverse health effects.		
E: No Public Health Hazard	Sufficient evidence indicates that no human exposures to contaminated media	
	have occurred, none are now occurring, and none are likely to occur in the	
This category is used for sites that, because of the absence	future	
of exposure, do NOT pose a public health hazard.		

^{*}Such as environmental and demographic data; health outcome data; exposure data; community health concerns information; toxicologic, medical, and epidemiologic data; monitoring and management plans