

Davis South Campus Superfund Oversight Committee
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February 11, 2000

County of Yolo
Department of Public Health
Tom Y. To, R.E.H.S., MPH, Director
Environmental Health Services
10 Cottonwood Street
Woodland, CA 95695

County of Solano
Department of Public Health
Birgetta Corsella
Environmental Health Services
601 Texas Street
Fairfield, CA 94533

Dear Mr. To and Ms. Corsella,

As part of the UC Davis/Department of Energy (UCD/DOE) LEHR Superfund site investigation on the UCD campus near Putah Creek, the Agency for Toxic Substance and Disease Registry (ATSDR) conducted two fish studies. Both studies found that mercury had bioaccumulated in some fish at hazardous levels and poses a public health hazard to those who consume the fish. ATSDR's first study recommended Putah Creek be posted to warn people about the hazard of consuming fish in the vicinity of the UCD campus wastewater and stormwater discharges to Putah Creek near the LEHR site. Although both Yolo and Solano County Environmental Health Agencies and other public agencies were notified of ATSDR's recommendation, no action was taken and Putah Creek was never posted to warn the public about consuming fish taken from Putah Creek.

ATSDR's second study (Phase II) confirmed the hazardous levels of mercury in edible (primarily largemouth bass) fish in Putah Creek near the UCD campus. ATSDR recommended that as a follow-up Public Health Action, the public be contacted on this issue. In a follow-up study, Dr. Darrell Slotton of UC Davis found that not only is there a problem of excessive mercury in fish taken near the University of California, Davis wastewater discharges to Putah Creek and its LEHR site stormwater discharges to Putah Creek, but also there were problems with excessive mercury accumulation in some fish throughout the length of Putah Creek.

ATSDR representatives proposed to work with local health officials to develop and implement a plan for providing survey information to persons who eat fish from Putah Creek. ATSDR also indicated that it would work with health department representatives to distribute information, including a summary of the fish survey and health implications of mercury exposure to local

health care providers who provide care to pregnant or lactating women. To my knowledge, ATSDR and/or local public health agencies have not implemented ATSDR's proposed follow-up Public Health Action. Further, the public has not been informed by the local health agencies, or, for that matter, anyone else, about the hazard of consuming fish taken from Putah Creek.

DSCSOC, the citizens oversight group at the LEHR site, has repeatedly requested that Putah Creek be posted and ATSDR's follow-up actions be implemented. The first priority must be to protect the public's health. The health risk to the public who use Putah Creek fish as a food source is not disputed. The reason DSCSOC has been given that ATSDR's recommendations have not been implemented is that no local agency is willing to accept authority/responsibility for posting the creek or conducting the recommended follow-up actions.

In the Friday, February 11, 2000 *San Francisco Chronicle* is an article on page A21 titled **San Pablo Reservoir Fish Tainted.** (Copy enclosed.) This article states **High levels of mercury found in largemouth bass in San Pablo Reservoir prompted Contra Costa County officials this week to issue an advisory warning against eating the fish.** The Contra Costa County Department of Health Services' advisory warns of the same health hazard to the public who eat mercury-contaminated fish from the San Pablo Reservoir as ATSDR recommended for the public who eat Putah Creek mercury-contaminated fish.

The article goes on to state that **A[Greg] Karras, [senior scientist at Communities for a Better Environment] and other activists said state and local government should move quickly to determine how great a threat dioxin, PCBs and mercury pose to various species of fish and to take action against known sources of pollution.** These same recommendations with respect to mercury in Putah Creek fish were issued by DSCSOC's technical advisor, Dr. G. Fred Lee, in his comments regarding the ATSDR studies and his comments on UCD/LEHR wastewater and stormwater discharges to Putah Creek. (I have enclosed a copy of Dr. Lee's **Unreliable Information on Hazards of Consuming Putah Creek Fish Due to Excessive Bioaccumulation of Mercury and Lead** dated April 13, 1998. Other comments provided by Dr. Lee on these subjects can be found on DSCSOC's document web site <http://members.aol.com/dscsoc/doc.htm>.)

It is unfortunate that, after two ATSDR studies found high levels of mercury contamination in Putah Creek fish and stated that these fish pose a public health hazard, Yolo and Solano County Departments of Health Services failed to implement ATSDR's recommended actions and failed to warn the citizens who eat Putah Creek fish. On the other hand, Contra Costa County Department of Health Services issued an advisory to warn its citizens of the public health hazard posed by eating mercury-contaminated fish from the San Pablo Reservoir, based on the same mercury contamination in its fish. Contra Costa County's action confirms that County Departments of Health Services have the authority/responsibility to issue advisory warnings to citizens against eating mercury-contaminated fish.

DSCSOC requests that Yolo and Solano County Departments of Public Health Services issue an immediate advisory warning for Putah Creek fish; move quickly to determine how great a threat dioxin, PCBs and mercury pose to various species of fish; and take action against known sources of pollution. The advisory warning, the posting of Putah Creek, implementing ATSDR's follow-up Public Health Actions, and a study of other possible hazardous chemicals in Putah Creek fish are actions that Yolo and Solano County Departments of Health Services should take

immediately to protect the public's health. These actions should be given a priority by your agencies.

Sincerely,

Julie Roth
Executive Director

cc: Wayne Henry, ATSDR
LEHR RPMs & PRPs
Gary Carlton, CVRWQCB
Dr. Val Connor, CVRWQCB
Dr. C. Foe, CVRWQCB
Bill Jennings, DeltaKeeper
Dr. G. Fred Lee, DSCSOC Advisor