

**TRIANA/TENNESSEE RIVER DDT CONTAMINATION,
SUPERFUND SITE EPA#ALD983166299
SUMMARY by GARRY MORGAN, BREDL/BEST/MATRR**

SUMMARY

Triana, Alabama is a town located on the southern county line of Madison County, Alabama, United States, and is included in the Huntsville-Decatur Combined Statistical Area. It is located at the confluence of Indian Creek and the Tennessee River. As of the 2010 census, the population of the town was 496. Approximately 70% of the town's racial makeup is black. City-Data Demographics:

<http://www.city-data.com/city/Triana-Alabama.html>

Wiki's listing on Triana regarding the DDT contamination: "In 1977, the EPA issued warnings that fish and waterfowl from the Huntsville Spring Branch had shown high levels of Dichlorodiphenyltrichloroethane (DDT) in their bodies. Two years later, the EPA began to investigate how the pollutant had contaminated the water supply of the area. The findings indicated that the pollutant came from the Olin Corporation's production of the chemical on Redstone Arsenal. Lawsuits were filed against Olin Corporation by residents of Triana, as well as the United States Department of Justice. These lawsuits were eventually settled."

"The water near Triana was monitored by the EPA from 1982-1995 to track the levels of DDT that was still in the Huntsville Spring Branch. During that time, the amount of DDT in the water was reduced by 97%. The EPA now considers the physical cleanup process for the site to be complete. Despite this, it is still on the Agency's Superfund list." http://en.wikipedia.org/wiki/Triana,_Alabama Below I'll discuss why the site is still on the Superfund list and what I believe to be an intentional effort by the EPA and others to cover-up the fact that Triana continues to exhibit DDT in the environment and is a threat to humans residing in the area.

Citizens residing in the Triana area and any citizen eating fish from the area should be tested and evaluated for cancer and ill health effects as a result of DDT contamination which persists in the environment.

The Fish and Wildlife Services Biologist in 2010 indicated DDT remains in the environment (linked below). In my opinion, the EPA in their summary has not only ignored the biologists review, they appear to support the Olin Corporation and not the people who live in the area.

The Michigan study linked below is recent and includes current info regarding DDT contamination and DDT health effects. The Michigan Study says this: "This is a public health hazard." DDT levels found at the Triana site fishery far exceed the Michigan levels. EPA nor the State of Alabama have issued any such advisory or warning.

There are high cancer rates for this area reflected in the National Cancer Institute cancer data linked below.

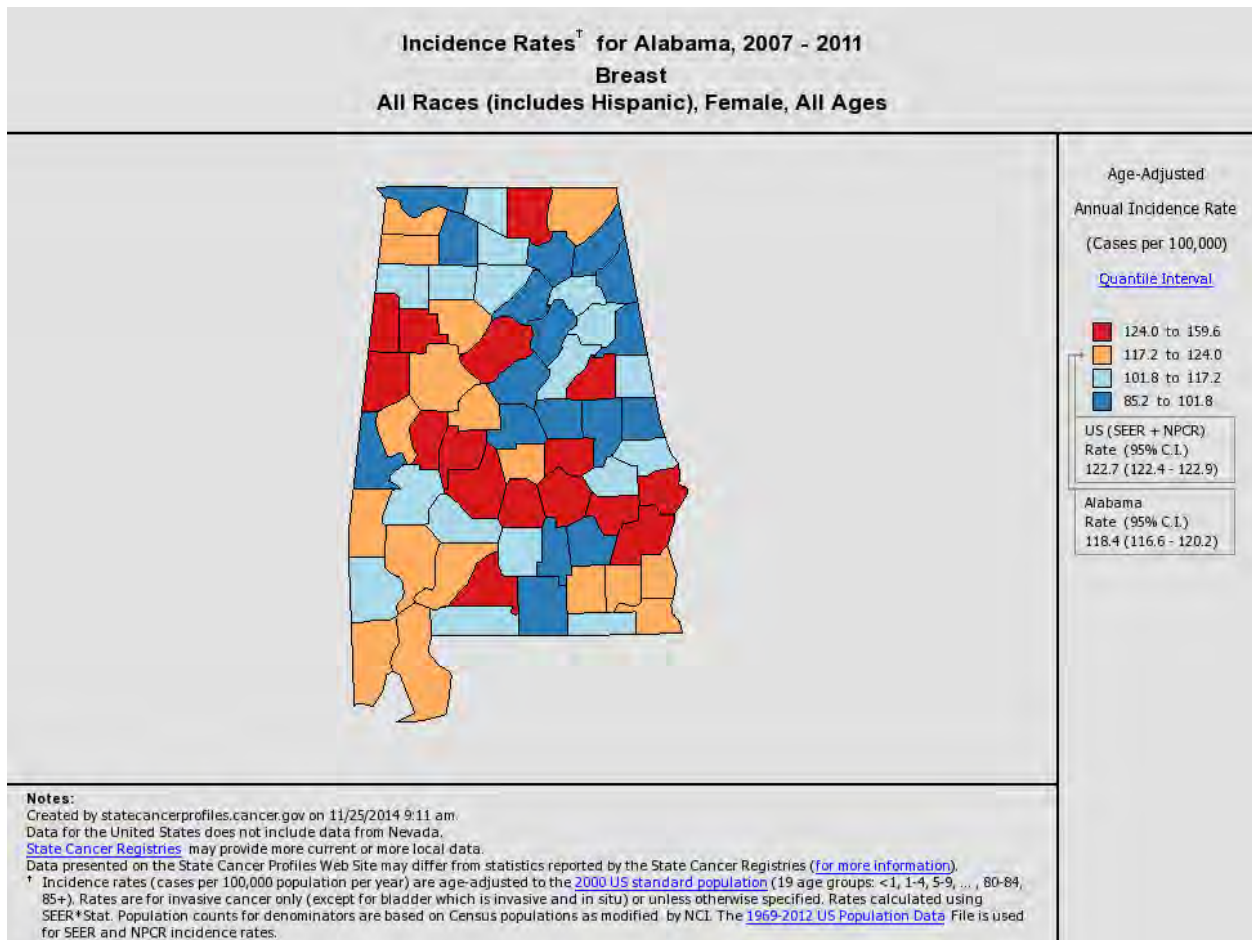
There have been no health evaluations of citizens in the Triana area, nor have there been any fish advisories issued, although DDT is in the environment and in the fishery.

I have been on 2 separate calls with the EPA, ADEM, USFWS and the Army at Redstone about the Triana issue within the past 30 days. Communications with the EPA have only been partially productive. The original public meeting scheduled for November 19, 2014 in Decatur was cancelled. It is my opinion the EPA is supportive of the Olin Corporation, the polluter, instead of the public.

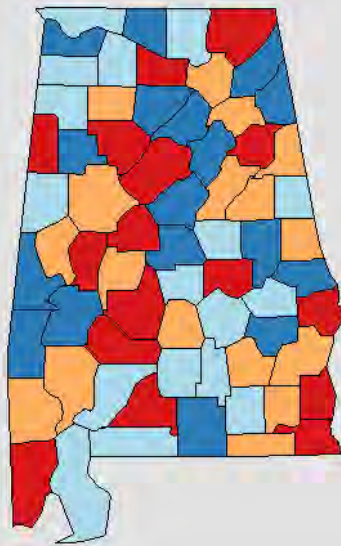
The EPA stated on my last call with them that they will announce a meeting in May of 2015. It is unclear if this will be a public meeting. The legal notice below mentions nothing about a May 2015 meeting. It is my impression that the EPA is attempting to avoid a public meeting. At the end of this paper, you will find a copy of the required current local EPA notice, which was buried in the legal section of the Huntsville Times.

Why the concern over DDT and failed chemical and hazardous substance contamination at Redstone Arsenal Alabama?

Madison County has high Breast Cancer rates. NIH study related to DDT and Breast Cancer <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC2022666/> Morgan County, across river from the contaminated area, has the highest cancer rates in the state. There are several cancers which are high in Morgan County. State Cancer Profile Maps: <http://statecancerprofiles.cancer.gov/map/map.withimage.php?01&001&001&00&0&01&0&1&4&0#results> Latest results are displayed below:



Incidence Rates[†] for Alabama, 2007 - 2011
All Cancer Sites
All Races (includes Hispanic), Both Sexes, All Ages



Age-Adjusted	
Annual Incidence Rate	
(Cases per 100,000)	
Quantile Interval	
■	478.3 to 555.9
■	453.9 to 478.3
■	429.4 to 453.9
■	360.2 to 429.4
US (SEER + NPCR)	
Rate (95% C.I.)	
459.8 (459.4 - 460.1)	
Alabama	
Rate (95% C.I.)	
463.3 (460.7 - 465.9)	

Notes:

Created by statecancerprofiles.cancer.gov on 12/08/2014 10:39 am.
 Data for the United States does not include data from Nevada.
[State Cancer Registries](#) may provide more current or more local data.
 Data presented on the State Cancer Profiles Web Site may differ from statistics reported by the State Cancer Registries ([for more information](#)).
[†] Incidence rates (cases per 100,000 population per year) are age-adjusted to the [2000 US standard population](#) (19 age groups: <1, 1-4, 5-9, ... , 80-84, 85+). Rates are for invasive cancer only (except for bladder which is invasive and in situ) or unless otherwise specified. Rates calculated using SEER*Stat. Population counts for denominators are based on Census populations as modified by NCI. The [1969-2012 US Population Data](#) File is used for SEER and NPCR incidence rates.

FISH TESTING

The testing regimen for fish in the Triana area of concern does not coincide with recommendations of the Fish & Wildlife Service Biologist. The EPA has attempted to downplay the 2010 biologist's report. It appears the EPA and the parties are not in compliance with the Federal Court Decision regarding the Triana DDT contamination issue. They are not testing all species of fish as required; they test only selected fillets from one species - Small Mouth Buffalo. They avoid the deposits of chemicals in the fatty belly tissue, and are not testing the Channel Catfish and Large Mouth Bass species. Current Test Results Document below:

APPENDIX A
2013 Annual Fish Collection
Huntsville Spring Branch - Indian Creek Fish
Analytical Data

Sample No	Species	Date of Capture	Reach	Site No	Location	Collection Method	T Length (cm)	T Weight (g)	F Weight (g)	Age	Sex	Use	Filet DDT-TA	Code (TA-DDT)	Filet Lipids	Code (TA-Lip)
1	RA-0001-13F	SMB	17-Apr-13	A	1	HSBM 4.0	electro shock	49.0	1759.1	388.4	5	F	2.82		1.6	
2	RA-0002-13F	SMB	17-Apr-13	A	1	HSBM 4.0	electro shock	42.3	1166.5	231.8	4	F	9.87		2.3	
3	RA-0003-13F	SMB	17-Apr-13	A	1	HSBM 4.0	electro shock	44.0	1121.0	226.2	4	M	7.1		0.7	
4	RA-0004-13F	SMB	17-Apr-13	A	1	HSBM 4.0	electro shock	44.8	1307.0	241.8	4	F	0.54	J	0.3	
5	RA-0005-13F	SMB	17-Apr-13	A	1	HSBM 4.0	electro shock	50.8	2106.3	379.6	6	F	1.37	J	2.1	
6	RA-0006-13F	SMB	17-Apr-13	A	1	HSBM 4.0	electro shock	45.8	1395.2	262.4	4	M	6.52	J	1.2	
7	RA-0007-13F	SMB	17-Apr-13	A	1	HSBM 4.0	electro shock	51.3	2024.2	370.8	6	F	3.77	J	8.1	
8	RA-0008-13F	SMB	17-Apr-13	A	1	HSBM 4.0	electro shock	49.2	1520.4	286.4	5	M	1.29	JA	0.6	
9	RA-0009-13F	SMB	17-Apr-13	A	2	HSBM 3.6	electro shock	44.0	1220.7	238.6	4	F	6.37		0.9	
10	RA-0010-13F	SMB	17-Apr-13	A	2	HSBM 3.6	electro shock	34.0	579.9	141.8	3	F	0.34	J	0.3	
11	RA-0011-13F	SMB	17-Apr-13	A	2	HSBM 3.6	electro shock	44.6	1209.2	276.4	4	M	1.82	J	0.75	
12	RA-0012-13F	SMB	17-Apr-13	A	2	HSBM 3.6	electro shock	47.4	1507.6	298.1	5	F	1.7		5.4	
13	RA-0013-13F	SMB	17-Apr-13	A	2	HSBM 3.6	electro shock	44.4	1332.0	286.2	4	F	1.24	JA	0.5	
14	RA-0014-13F	SMB	17-Apr-13	A	2	HSBM 3.6	electro shock	41.5	1516.5	290.2	4	F	1.15	J	0.25	U
15	RA-0015-13F	SMB	17-Apr-13	A	2	HSBM 3.6	electro shock	51.7	1985.0	416.8	5	M	0.93	J	2.3	
16	RA-0016-13F	SMB	17-Apr-13	A	2	HSBM 3.6	electro shock	46.5	1418.5	354.2	4	M	7.22	J	1.7	
17	RA-0017-13F	SMB	17-Apr-13	A	3	HSBM 2.4	electro shock	45.5	1662.5	361.8	4	M	4.55	J	0.82	
18	RA-0018-13F	SMB	17-Apr-13	A	3	HSBM 2.4	electro shock	41.0	930.4	211.8	3	M	10.98	JA	1.6	
19	RA-0019-13F	SMB	17-Apr-13	A	3	HSBM 2.4	electro shock	46.0	1252.6	235.6	4	M	5.57	J	0.65	
20	RA-0020-13F	SMB	17-Apr-13	A	3	HSBM 2.4	electro shock	51.0	1920.8	365.3	5	F	1.22	J	0.9	
21	RA-0021-13F	SMB	17-Apr-13	A	3	HSBM 2.4	electro shock	63.0	3151.1	652.8	7	F	17.58		8.0	
22	RA-0022-13F	SMB	17-Apr-13	A	3	HSBM 2.4	electro shock	59.2	2847.2	570.8	7	F	3.97	N	2.8	
23	RA-0023-13F	SMB	17-Apr-13	A	3	HSBM 2.4	electro shock	32.3	504.5	132.6	3	M	0.82	J	0.28	
24	RA-0024-13F	SMB	17-Apr-13	A	3	HSBM 2.4	electro shock	41.5	1122.3	251.0	4	M	8.02		0.8	
25	RA-0025-13F	SMB	17-Apr-13	A	3	HSBM 2.4	electro shock	43.9	1220.7	273.9	4	F	11.2		1.8	

Small mouth buffalo - no catfish or large mouth bass
HSB only - no LC
40
28 about 5ppm
12% over 100% 5ppm threshold level
USFWS prior review report indicates DDT in water - this report supports

Handwritten signature
117.72 Total

The statement by the EPA that there is no DDT in Bass and Catfish does not demonstrate there is no contamination. The EPA maintains that a select group of fish, tested more than 10 years previously, demonstrated there is no longer a need to test Bass and Catfish. The testing area in the last review was very restricted, testing a 1.6 mile area of Indian Creek. Testing did not include the Huntsville Spring Branch nor all originally tested areas in Indian Creek. Even so, 40% of the fish tested exceeded the 5ppm DDT, which was the maximum contamination level mandated in fish by the Federal Consent Decree. Of the 25 fish tested, the average was 4.3ppm for DDT. One fish which had a contamination level of 17.2ppm was removed from the test group because the fish was 7 years of age, the test age was restricted for 3-6 year fish only. Originally the fish tested had DDT levels of 140ppm plus. There have been improvements, however DDT remains in the environment and in the words of the biologist - DDT remains a threat to the environment and humans. The EPA ignored the biologist's finding in the 2010 report, stating in the summary that the remedy remains protective of the environment.

Current studies demonstrate that the contaminated Triana fishery should result in fish advisories, yet no advisories are posted.

MICHIGAN STUDY-

http://www.michigan.gov/documents/mdch/DDT_LHC_FCSV_2012_10_21_402648_7.pdf This study provides a warning which is not taken into consideration by the EPA and responsible parties in Triana. The maximum DDT in fish was found to be 2.98ppm in Michigan Fish. Many fish in the Triana area exceeded the 2.98ppm level. "...This is a public health hazard. Fish consumption advisories may be required for certain fish species at specific locations. Too frequent of consumption of filets contaminated with DDT and its metabolites increases both cancer and non-cancer risks for the consumer."

WATER INTAKE and DREDGING –

Of particular concern is the dredging which will soon occur to install a new public water intake in the Triana area of concern. DDT is in the sediment at the Triana site, and dredging will "stir up" this sediment.

DOCUMENTS –

The last 5 year report on the Triana EPA Superfund Cleanup Site, dated February 2010.

<http://www.epa.gov/superfund/sites/fiveyear/f2010040003356.pdf>

USFWS Biologists' statement on Pages C-9, 10 & 11 of the report indicates a continuing problem of DDT contamination of the Biosphere as described by the US. Fish and Wildlife Service Biologist Peter Tuttle.

Statement from the Wheeler Fish and Wildlife official at the last review. "...recent monitoring indicates that residual DDT contamination in the HSB-IC (Huntsville Spring Branch-Indian Creek) System continues to represent a significant threat to fish, and habitat quality. Continued risk to human health is also a concern...USFWS is concerned that current levels of DDT in this system are not protective of fish, wildlife or habitat quality on the WNWR (Wheeler National Wildlife Refuge)."

EPA info on Triana:

<http://www.epa.gov/region4/superfund/sites/npl/alabama/triatenval.html#community>

EPA Triana listing:

http://nlquery.epa.gov/epasearch/epasearch?typeofsearch=epa&client=new_frontend&epasearch&&filter=samplefilt.hts&fld=region04&url_directory&federated=no&max_results=200&referer=http%3A%2F%2Fwww.epa.gov%2Fregion4%2Fair%2Fpesticides%2F&result_template=2col.ftl&areaname=Region%204&areapagehead=epafiles_pagehead&areapagefoot=epafiles_pagefoot&areasidebar=search_sidebar&stylesheet&sort=term_relevancy&faq=true&results_per_page=20&cluster=no&sessionid=F25A4C9D2D71F718AA8D8EF551CC4625&querytext= triana%20tennessee%20river&q=Triana

FAILED CHEMICAL and HAZARDOUS SUBSTANCE CONTAINMENT –

There are additional issues of chemical and hazardous substances containment on Redstone Arsenal as evidenced by this report. LA Times article: "**Redstone Arsenal, in the swampy lowlands of northern Alabama, is the largest of the 249 sites in 40 U.S. states and territories where chemical weapons remain buried and await cleanup at a cost of billions of dollars.**"

<http://www.latimes.com/nation/la-na-chemical-weapons-cleanup-video-20140321,0,1936291.premiumvideo>

LEGAL NOTICE - This is the notice which was published in the Huntsville Times on December 5, 2014, found on page 2 of the legal section:

PUBLIC NOTICE The U.S. Environmental Protection Agency, Region 4 announces the Fifth Five-Year Review for the Triana/Tennessee River Superfund Site, Triana, Morgan/Limestone/ Madison Counties, Alabama Purpose/Objective: EPA is conducting a Five-Year Review of the remedy for the Triana/Tennessee River Superfund site (the Site) in Triana, Alabama. The purpose of the Five-Year Review is to make sure the selected cleanup actions effectively protect human health and the environment. Site Background: The Site is located about five miles southwest of Huntsville, Alabama. It consists of an 11-mile stretch of two tributaries, the Huntsville Spring Branch and Indian Creek, which empty into the Tennessee River near the town of Triana. The area is located within Wheeler National Wildlife Refuge and the Redstone Arsenal. From 1947 to 1970, the Olin Corporation (Olin) operated a dichlorodiphenyltrichloroethane (DDT) manufacturing plant within Redstone Arsenal and discharged wastewater into Huntsville Spring Branch. Fish in the area became contaminated with DDT from contaminated stream sediments. EPA placed the Site on the Superfund program's National Priorities List (NPL) in September 1983. Cleanup Actions: To address the contamination, the State of Alabama, EPA and Olin entered into a Consent Decree in May 1983. The Consent Decree required that Olin implement a remedial plan and meet a performance standard of five parts per million of DDT in fillets of channel catfish, largemouth bass and smallmouth buffalo fish within 10 years from the date of the remedy's construction completion. The Consent Decree also provided for a Review Panel responsible for technical review of Olin's proposals to meet the performance standard. Remedial actions consisted of diverting stream flow around contaminated portions of the tributaries, excavating new channels, excavating some contaminated sediments and burying other contaminated sediments in place. These remedial actions began in April 1986 and finished in January 1988. An extension of the fish monitoring has been granted to ensure achievement of the DDT performance standard in fish fillets. Continued attainment of the performance standard has been achieved in both largemouth bass and channel catfish. Olin no longer monitors these species. Progress continues toward meeting the performance standard in smallmouth buffalo fish. Five-Year Review Schedule: For NPL sites, a review is required every five years for cleanups where contaminants remain above levels that allow for unlimited use and unrestricted exposure. This is the fifth Five-Year Review for this Site and is scheduled for completion by February 17, 2015. EPA Invites Community Participation in the Five-Year Review Process: EPA is conducting this Five-Year Review to evaluate the effectiveness of the Site's remedy and to ensure that the remedy remains protective of human health and the environment. As part of the Five-Year Review process, EPA staff is available to answer questions about the Site. Community members who have questions, or who would like to participate in a community interview, are asked to contact: Brian Farrier, EPA Remedial Project Manager Email: farrier.brian@epa.gov L'Tonya

Spencer, EPA Community Involvement Coordinator Phone: (404) 562-8463 | (877) 718-3752 (toll-free) Email: spencer.latonya@epa.gov Mailing Add...

Link:

[http://classifieds.al.com/Merch?cur_cat=6869&property=al_hsvtimes_merch&temp_type=browse&category=results&tp=ME_bama&classification=Notices%20and%20Announcements&orderby=feature_value\(featured_listing\)%3Anl%2Cdate_created%3Ad&PAGE=2&_AC=68](http://classifieds.al.com/Merch?cur_cat=6869&property=al_hsvtimes_merch&temp_type=browse&category=results&tp=ME_bama&classification=Notices%20and%20Announcements&orderby=feature_value(featured_listing)%3Anl%2Cdate_created%3Ad&PAGE=2&_AC=68)

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