



National Federation of Federal Employees



Local 2050

4/24/92

Mr. Gary Null
Box 918
Planetarium Station
NY, NY 10024

Dear Gary,

The case against adding fluoride to drinking water will spring to life when the record of how EPA went about setting the standard for fluoride in drinking water is examined. By looking at this record, you can determine that science played a subservient (if not harlot) role to politics in deciding what level was safe for humans to ingest over a lifetime. It is obvious that large forces were at work to support previous positions without any regard for the truth. These pressures came from the Public Health Service, the National Institute for Dental Research, the American Dental Association and others. Many of those involved in the coverup on the report from the Public Health Service can be determined by examining the available letters surrounding the "expert panel" that was set up by the Surgeon General. It will take a court proceeding to discover all the culprits. Similarly, many of those involved at EPA can be determined by examining the record of those who were involved in developing the standard and who were in management positions. The bottom line is that this exercise at EPA shows how the dental establishment has lied over the years and how EPA is completely susceptible to political pressure. Science at EPA is an annoyance to policy makers because it forces them to confront some of our society's real shortcomings.

You do not need to know all the literature on fluoride to see that EPA:

- (1) made political decisions and called them scientific,
- (2) misrepresented the requirements of the law,
- (3) rejected professional opinions without justification,
- (4) ignored contradictions between the testimony of the Surgeon General's advisory committee and the final report which claimed to represent these deliberations,
- (5) made factual errors in matters that are critical to the conclusions, and
- (6) failed to produce a final peer-reviewed scientific document in support of their findings.

My discussions with professionals involved in developing the standard also support these allegations. It will take a formal legal trial/hearing to get the truth out of these people as well.

It is clear that on the basis of dental fluorosis effects alone, the standard should have been set at 0.5 ppm or less, not 4 ppm. Instead, EPA decided to call severe dental fluorosis a "Cosmetic effect", effectively removing it from regulatory control. Skeletal fluorosis was chosen as the effect of choice, but they worked feverishly to avoid doing any serious work to find out the lowest dose known to cause the first signs of disease (arthritis). EPA settled on looking at only the final stages of the disease (crippling skeletal fluorosis) to set its standard. There is evidence that 1 ppm can cause calcification of ligaments and tendons, possibly resulting in repetitive stress injury which is reported to be on the rise throughout the U.S.

Attached to this letter is a series of letters between Ms. Darlene Sherrell, Sen. Bob Graham of Florida, and representatives of the National Academy of Sciences (Attachment #1). In these letters Ms. Sherrell is trying to determine where the National Academy of Sciences got its conclusions that 20-80 mg/day of fluoride will cause crippling skeletal fluorosis. In this amazing exchange - which took the intervention of a senator to jump start - we find that the NAS does not even have a copy of the most fundamental research (Roholm) ever done on crippling skeletal fluorosis. Worse, we find that the only real reference that NAS has for the 20-80 mg/day figure is a report by Hodge and Smith where this figure is found but there is no substantiation for the claim. In other words, the entire fluoride standard is based on a number that can not be substantiated.

Every attempt by our Union to get EPA to examine what they did went to no avail. All the letters we sent are in our files here in Washington if you care to send someone to examine and copy them. Attached is a listing of important dates, memos, letters, news clippings etc. that I have acquired. (Attachment #2) There is a chronological listing followed by a listing of some of these pieces by author or organization. In the larger file, items with an "*" means that they also appear in the author or organization file.

There is also a gigantic problem in that EPA was using the wrong figures for how much water people drink to arrive at the 4 ppm standard. EPA used 2 liters/day for an adult which is only an average. About 50% of adults drink more than this, some even as high as 6-10 liters/day. At the standard of 4 mg/l, someone drinking 6 liters/day would consume 24 mg a day which exceeds the amount EPA says will cause crippling skeletal fluorosis. With the help of Ralph Nader, our Union tried to get EPA to look at

that aspect but were ignored. Nader put out a press release which EPA just denied with no factual basis. (Attachment #3) The bottom line here is that EPA deliberately used 2 liters/day in order to claim a 2.5 fold safety factor (2 liters/day at 4 mg/l = 8 mg/day or 2.5 times less than the threshold for crippling skeletal fluorosis.)

There are also other actions which EPA has taken with regards to fluoride such as turning down a citizens petition to put fluoride on the toxic release inventory - the Citizens Right to Know list. (Attachment #4) Ms Martha Bevis of the Safe Water Foundation of Texas submitted the petition and can give you the particulars of how EPA illegally turned her down. She can also tell you how EPA "lost" all of the information she sent to the EPA docket for use in developing the drinking water standard. She also has notes of confidential conversations with EPA employees who told her that politics was interfering with science on the drinking water standard.

There are other actions the Federal Government has taken since the fluoride standard by EPA which have possible signs of fraud. The National Toxicology Program released a report in 1990 claiming that a cancer study on rats and mice resulted in "equivocal" results. Dr. Bill Marcus, as senior toxicologist in the Office of Drinking Water, pointed out possible deliberate downgrading of cancer findings. (Attachment #5 & #9) He is now, as you know, on the block for possible firing. Because of Congressional action, his firing has been delayed. His original firing date was about February 13. It is now April 23 and he is still with us. Attached is a paper on the I wrote on the NTP study which is going to be published in the journal Fluoride later this year. (Attachment #6).

Recently, a world famous toxicologist, Dr. Edward J. Calabrese, Ph.D. from the University of Massachusetts, School of Public Health, wrote a paper criticizing the NTP conclusions and basically agreeing with Bill Marcus. (Attachment #7) Congressman Ted Weiss is conducting an investigation of the NTP study and has promised to hold hearings. (His aide is named Marc Smolonsky). Also, at a recent meeting of the Society of Toxicologists in Seattle, a well-known government scientist from the National Institute of Environmental Health Sciences which houses the NTP, was reported in the press to state that the NTP study did show that fluoride caused osteosarcoma. (Attachment #8).

Also, at that meeting, Dr. Edward Ohanion from EPA made false statements about the requirements of the Safe Drinking Water Act claiming that EPA had to weigh benefits and risks when setting a standard. Dr. Marcus wrote another memo on this action. (Attachment #9).

In the last few years, numerous studies have emerged showing that fluoride causes brittle bones (hip fractures and others). Dr. Bill Marcus told EPA something needed to be done - and they ignored him. (Attachment #10).

The Union also brought to the attention of the EPA Administrator, William K. Reilly, that fluoride is apparently not beneficial (Attachment #11). Dr. John Yiamouyiannis' study, using the National Institute for Dental Research's own data, showed virtually no difference in tooth decay rates between fluoridated and non-fluoridated cities. (#12) This information was also ignored by EPA.

As you know, there is a lot more to tell. Many individuals throughout this country and other countries have important information on the science and public policy of fluoridation: Dr. John Lee, Dr. A.K. Susheela, Dr. Mark Diesendorf, Dr. John Colquhoun, Dr. Albert Burgstahler, Len Greenall (whose house was burned down because he was so effective in opposing fluoridation), the staff of the New York State Coalition Opposed to Fluoridation (Paul Beeber, Eleanor Krinsky), Susan Perry, etc.

Please, see if you can send someone down to see me and look at the files. Please let me know what you would like to do.

Sincerely,



Robert J. Carton, Ph.D.