"ATIONAL FEDERATION OF FEDERAL EMPLOYEES
SERVING FEDERAL EMPLOYEES...AND THE NATION...SINCE 1917

Local_____

DEC 10 1985

Honorable Lee M. Thomas, Administrator
U.S. Environmental Protection Agency
Washington, D.C. 20460

Dear Mr. Thomas,

In our letter of November 15, I detailed our Union's concerns for the quality of scientific support documents for the newly authorized Recommended Contaminant Level (RMCL) for fluoride in drinking water, and the implications for the reputation of the EPA professional community. In response, a member of your staff informed us that high level personnel in the Agency do not share our concern.

The point of our letter, which detailed errors of fact and distortions in the support documents, was that there should be concern -- for the Agency's reputation as well as for that of the professional community. In fact, a close reading of the November 14, 1985, Federal Register notice makes us wonder if we should change our conclusions from "concern" to "alarm."

Apparently, in the crush of public comments and a court-ordered deadline, new information that completely negates any claim that the RMCL of 4 mg/L is safe was overlooked. The Federal Register states that:

> "... the EPA agrees with the Surgeon General that crippling skeletal fluorosis is an adverse health effect which results from intakes of fluoride of 20 mg/day over periods of 20 years or more..."

The new information documents that the drinking water consumption of the American public is much greater than anticipated, and that 1% of the population -- if they drink water containing fluoride at the RMCL -- will ingest 20 mg/day or more from drinking water alone. This means that the Agency proposes to set a standard which it knows in advance will cause crippling skeletal fluorosis to some people in the U.S.

As painful as it may be to admit an error, this is what needs to be done and the effective date of the regulation (December 16, 1985) suspended.

The problem presented above is not the only problem with the science behind the regulation. Suspending the effective date will give EPA the opportunity to completely reassess the entire basis for the standard. We professionals want EPA to produce the best posssible scientific and legal products. We offer our assistance in helping to achieve this goal.

Sincerly,

Robert J. Carton, Ph.D.
President-elect
NFFE Local 2050

cc Michael Cook
Robert Wayland