A STATEMENT OF CONCERN ON FLUORIDATION

Understanding and appreciating the historical reasons for advocating fluoridation, the undersigned professionals now recognize valid concerns about its safety and about its impact on the environment. This Statement serves as a vehicle for expressing these concerns. However, it is not a position statement on fluoridation, nor does it commit the undersigned to any point of view other than what is stated clearly in this document. A brief summary of recent events, reports, and research underlying our concerns, as well as a list of references, are supplementary to this document. (Link to footnotes in this article.)

OUR MAJOR CONCERNS:

I. Environmental Concerns

Silicofluorides: unrefined industrial waste

91% of Americans ingesting artificially fluoridated water are consuming silicofluorides. This is a class of fluoridation chemicals that includes hydrofluosilicic acid and its salt form, sodium fluorosilicate. These chemicals are collected from the pollution scrubbers of the phosphate fertilizer industry. The scrubber liquors contain contaminants such as arsenic, lead, cadmium, mercury, and radioactive particles, are legally regulated as toxic waste, and are prohibited from direct dispersal into the environment. Upon being sold (unrefined) to municipalities as fluoridating agents, these same substances are then considered a "product", allowing them to be dispensed through fluoridated municipal water systems to the very same ecosystems to which they could not be released directly. Sodium fluoride, used in the remaining municipalities, is also an industrial waste product that contains hazardous contaminants.

Scarcity of environmental impact studies

This is of deep concern to us. Studies that do exist indicate damage to salmon and to plant ecosystems. It is significant that Canada's water quality guideline to protect freshwater life is 0.12 ppm (parts per million).

99.97% of fluoridated water is released directly into the environment at around 1ppm

This water is NOT used for drinking or cooking.

II. Health Concerns

Absence of safety studies on silicofluorides
When asked by the U.S. House Committee on Science for chronic toxicity test data on sodium fluorosilicate and hydrofluorosilicic acid, Charles Fox of the EPA answered on June 23, 1999, “EPA was not able to identify chronic toxicity data on these chemicals.” Further, EPA's National Risk Management Research Laboratory stated, on April 25, 2002, that the chemistry of silicofluorides is "not well understood" and studies are needed.

**EPA health goals ignored**

The EPA defines the Maximum Contaminant Level Goal (MCLG) for toxic elements in drinking water thus: "the level below which there are no known or anticipated effects to health." The MCLG for arsenic, lead, and radioactive particles, all contaminants of the scrubber liquors used for fluoridation, is 0.0 ppb (zero parts per billion). Therefore, any addition of fluorine-bearing substances to drinking water that include these contaminants is contrary to the intent of EPA's established health goals.

**Increased blood lead levels in children**

Two recent studies with a combined sampling of over 400,000 children found significantly increased levels of lead in children's blood when silicofluorides from the phosphate fertilizer industry were used as the fluoridating agent. This shows that there is a significant difference in health effects even between different fluoridation compounds.

**Ingestion of fluoride linked to many health effects**

Contrary to assertions that the health effects of fluoride ingestion already have been scientifically proven to be safe and that there is no credible scientific concern, over the last fifteen years the ingestion of fluoride has been linked in scientific peer-reviewed literature to neurotoxicity, bone pathology, reproductive effects, interference with the pineal gland, gene mutations, thyroid pathology, and the increasing incidence and severity of dental fluorosis. This has caused professionals who once championed the uses of fluoride in preventing tooth decay, to reverse their position and call for a halt in further exposures. It is of significance that 14 Nobel Prize winning scientists, including the 2000 Nobel Laureate in Medicine, Arvid Carlsson, have expressed reservations on, or outright opposition to, fluoridation.

**FDA has never approved systemic use of fluoride**

The U.S. Food and Drug Administration in December 2000 stated to the U.S. House Committee on Science they have never provided any specific approval for safety or effectiveness for any fluoride substance intended to be ingested for the purpose of reducing tooth decay.

**Total fluoride exposure of growing concern**

Total fluoride exposure from all sources, including food, water, and air, is of growing concern within the scientific community. As evidenced in the U.S. Public Health Service ATSDR 1993 report which was referenced in correspondence between the U.S. House Committee on Science and Charles Fox of the U.S. EPA, large subsets of the population, including the elderly, children, and pregnant women, may be unusually susceptible to the toxic effects of fluoride.

**Centers for Disease Control concession**

The CDC now concedes that the systemic value of ingesting fluoride is minimal, as fluoride's oral health benefits are predominantly topical, and that there has been a generalized increase in dental fluorosis.

**III. In Consideration of the concerns raised above, we urge fluoridated cities, states with mandatory fluoridation, health care professionals, and public health authorities, to review ALL current information available, and use this information to re-evaluate current practices.**
IV. Congressional Investigation is Appropriate

This Statement of Concern (same substance, slightly different content and form), along with a significant list of signatures, was unveiled at the May 6, 2003 EPA Science Forum session on fluoridation in support of the National Treasury Employees Union Chapter 280 (EPA union of professionals) renewed call for a Congressional investigation. No authorities from government agencies or non-governmental organizations responded to widespread EPA invitations over a six-week period, to attend this session to explain/defend the practice of fluoridation. In view of this fact, and also that some serious questions of propriety have been posed but not addressed, about the formulation of the EPA's drinking water standards for fluoride21, as well as the downgrading of cancer bioassay data by the EPA in 199022, it now seems especially valid to ask Congress to hold hearings that will compel promoters to answer many unanswered questions.

It is appropriate that the U.S. Congress undertake an in-depth investigation of this public policy that is endorsed by major U.S. government agencies, but has never been adequately reviewed in its long history. Considering that there is an absence of research on silicofluorides, and that the latest scientific research on toxicity of fluorides has never been included in any government policy-making, and considering the many unanswered questions and concerns, we join the USEPA Union of professional employees in calling for a full-scale Congressional investigation into the public policy of fluoridation.

Please complete form and fax or mail back; contact information at bottom of page.

It is only necessary to send back this ONE side. Please PRINT information clearly. Thank you!

Name, professional degree(s), title and/or position:
____________________________________________________________________________
____________________________________________________________________________
Address: ______________________________________________________________________
City: _______________________Zip: ___________
Phone: ____________________________E-mail: __________________________
Signature: ____________________________ Date: _____________________

PLEASE SEND OR FAX SIGNED STATEMENT TO:

Second Look, P.O. Box 20915, Worcester, MA 01602-0915
Fax: (508) 755-1535 Phone: (508) 755-7352
Footnotes in Statement of Concern on Fluoridation
(For a more comprehensive list of scientific literature, see Bibliography section at www.SLweb.org.)


4 Personal communication with Dave Paris, Manchester Water Works, NH. (January 2001) Calculation based on estimated two-liters/person/day used for drinking and cooking.


7 Neurotoxicity

8 Bone Pathology
-- Jacobsen, S., J. Goldberg, et al. (1992). The association between water fluoridation and hip fracture among white women and
men aged 65 years and older; a national ecologic study. *Annals of Epidemiology* 2: 617-626.


*It should be noted that there are studies that found no relation between fluoridation and fractures.*

### 9 Reproductive Effects:


### 10 Impact on Pineal Gland


### 11 Genetic Damage


### 12 Thyroid Pathology
13 Dental Fluorosis


STATEMENT OF

Dr. J. WILLIAM HIRZY

NATIONAL TREASURY EMPLOYEES UNION CHAPTER 280

BEFORE THE

SUBCOMMITTEE ON WILDLIFE, FISHERIES AND DRINKING WATER

UNITED STATES SENATE

JUNE 29, 2000

Good morning Mr. Chairman and Members of the Subcommittee. I appreciate the opportunity to appear before this Subcommittee to present the views of the union, of which I am a Vice-President, on the subject of fluoridation of public water supplies.

Our union is comprised of and represents the professional employees at the headquarters location of the U.S. Environmental Protection Agency in Washington D.C. Our members include toxicologists, biologists, chemists, engineers, lawyers and others defined by law as "professionals." The work we do includes evaluation of toxicity, exposure and economic information for management's use in formulating public health and environmental protection policy. I am not here as a representative of EPA, but rather as a representative of EPA headquarters professional employees, through their duly elected labor union. The union first got involved in this issue in 1985 as a matter of professional ethics. In 1997 we most recently voted to oppose fluoridation. Our opposition has strengthened since then.

Summary of Recommendations

1) We ask that you order an independent review of a cancer bioassay previously mandated by Congressional committee and subsequently performed by Battelle Memorial Institute with appropriate blinding and instructions that all reviewer's independent determinations be reported to this Committee.

2) We ask that you order that the two waste products of the fertilizer industry that are now used in 90% of fluoridation programs, for which EPA states they are not able to identify any chronic studies, be used in any future toxicity studies, rather than a substitute chemical. Further, since federal agencies are actively advocating that each man woman and child drink, eat and bathe in these chemicals, silicofluorides should be placed at the head of the list for establishing a MCL that complies with the Safe Drinking Water Act. This means that the MCL be protective of the most sensitive of our population, including infants, with an appropriate margin of safety for ingestion over an entire lifetime.

3) We ask that you order an epidemiology study comparing children with dental fluorosis to those not displaying overdose during growth and development years for behavioral and other disorders.

4) We ask that you convene a joint Congressional Committee to give the only substance that is being mandated for ingestion throughout this country the full hearing that it deserves.

National Review of Fluoridation The Subcommittee's hearing today can only begin to get at the issues surrounding the policy of water fluoridation in the United States, a massive experiment that has been run on the American public, without informed consent, for over fifty years. The last Congressional hearings on this subject were held in 1977. Much knowledge has been gained in the intervening years. It is high time for a national review of this policy by a Joint Select Committee of Congress. New hearings should explore, at minimum, these points:

1) excessive and un-controlled fluoride exposures;
2) altered findings of a cancer bioassay;  
3) the results and implications of recent brain effects research;  
4) the "protected pollutant" status of fluoride within EPA;  
5) the altered recommendations to EPA of a 1983 Surgeon General's Panel on fluoride;  
6) the results of a fifty-year experiment on fluoridation in two New York communities;  
7) the findings of fact in three landmark lawsuits since 1978;  
8) the findings and implications of recent research linking the predominant fluoridation chemical with elevated blood-lead levels in children and anti-social behavior; and  
9) changing views among dental researchers on the efficacy of water fluoridation

Fluoride Exposures Are Excessive and Un-controlled

According to a study by the National Institute of Dental Research, 66 percent of America's children in fluoridated communities show the visible sign of over-exposure and fluoride toxicity, dental fluorosis (1). That result is from a survey done in the mid-1980's and the figure today is undoubtedly much higher.

Centers for Disease Control and EPA claim that dental fluorosis is only a "cosmetic" effect. God did not create humans with fluorosed teeth. That effect occurs when children ingest more fluoride than their bodies can handle with the metabolic processes we were born with, and their teeth are damaged as a result. And not only their teeth. Children's bones and other tissues, as well as their developing teeth are accumulating too much fluoride. We can see the effect on teeth. Few researchers, if any, are looking for the effects of excessive fluoride exposure on bone and other tissues in American children. What has been reported so far in this connection is disturbing. One example is epidemiological evidence (2a, 2b) showing elevated bone cancer in young men related to consumption of fluoridated drinking water.

Without trying to ascribe a cause and effect relationship beforehand, we do know that American children in large numbers are afflicted with hyperactivity-attention deficit disorder, that autism seems to be on the rise, that bone fractures in young athletes and military personnel are on the rise, that earlier onset of puberty in young women is occurring. There are biologically plausible mechanisms described in peer-reviewed research on fluoride that can link some of these effects to fluoride exposures (e.g. 3,4,5,6). Considering the economic and human costs of these conditions, we believe that Congress should order epidemiology studies that use dental fluorosis as an index of exposure to determine if there are links between such effects and fluoride over-exposure.

In the interim, while this epidemiology is conducted, we believe that a national moratorium on water fluoridation should be instituted. There will be a hue and cry from some quarters, predicting increased dental caries, but Europe has about the same rate of dental caries as the U.S. (7) and most European countries do not fluoridate (8). I am submitting letters from European and Asian authorities on this point. There are studies in the U.S. of localities that have interrupted fluoridation with no discernable increase in dental caries rates (e.g., 9). And people who want the freedom of choice to continue to ingest fluoride can do so by other means.

Cancer Bioassay Findings

In 1990, the results of the National Toxicology Program cancer bioassay on sodium fluoride were published (10), the initial findings of which would have ended fluoridation. But a special commission was hastily convened to review the findings, resulting in the salvation of fluoridation through systematic down-grading of the evidence of carcinogenicity. The final, published version of the NTP report says that there is, "equivocal evidence of carcinogenicity in male rats," changed from "clear evidence of carcinogenicity in male rats."

The change prompted Dr. William Marcus, who was then Senior Science Adviser and Toxicologist in the Office of Drinking Water, to blow the whistle about the issue (22), which led to his firing by EPA. Dr. Marcus sued EPA, won his case and was reinstated with back pay, benefits and compensatory damages. I am submitting material from Dr.
Marcus to the Subcommittee dealing with the cancer and neurotoxicity risks posed by fluoridation.

We believe the Subcommittee should call for an independent review of the tumor slides from the bioassay, as was called for by Dr. Marcus (22), with the results to be presented in a hearing before a Select Committee of the Congress. The scientists who conducted the original study, the original reviewers of the study, and the "review commission" members should be called, and an explanation given for the changed findings.

**Brain Effects Research** Since 1994 there have been six publications that link fluoride exposure to direct adverse effects on the brain. Two epidemiology studies from China indicate depression of I.Q. in children (11,12). Another paper (3) shows a link between prenatal exposure of animals to fluoride and subsequent birth of off-spring which are hyperactive throughout life. A 1998 paper shows brain and kidney damage in animals given the "optimal" dosage of fluoride, viz. one part per million (13). And another (14) shows decreased levels of a key substance in the brain that may explain the results in the other paper from that journal. Another publication (5) links fluoride dosing to adverse effects on the brain's pineal gland and pre-mature onset of sexual maturity in animals. Earlier onset of menstruation of girls in fluoridated Newburg, New York has also been reported (6).

Given the national concern over incidence of attention deficit-hyperactivity disorder and autism in our children, we believe that the authors of these studies should be called before a Select Committee, along with those who have critiqued their studies, so the American public and the Congress can understand the implications of this work.

**Fluoride as a Protected Pollutant** The classic example of EPA's protective treatment of this substance, recognized the world over and in the U.S. before the linguistic de-toxification campaign of the 1940's and 1950's as a major environmental pollutant, is the 1983 statement by EPA's then Deputy Assistant Administrator for Water, Rebecca Hamner (15), that EPA views the use of hydrofluosilicic acid recovered from the waste stream of phosphate fertilizer manufacture as,

"...an ideal solution to a long standing problem. By recovering by-product fluosilicic acid (sic) from fertilizer manufacturing, water and air pollution are minimized, and water authorities have a low-cost source of fluoride..."

In other words, the solution to pollution is dilution, as long as the pollutant is dumped straight into drinking water systems and not into rivers or the atmosphere. I am submitting a copy of her letter.

Other Federal entities are also protective of fluoride. Congressman Calvert of the House Science Committee has sent letters of inquiry to EPA and other Federal entities on the matter of fluoride, answers to which have not yet been received.

We believe that EPA and other Federal officials should be called to testify on the manner in which fluoride has been protected. The union will be happy to assist the Congress in identifying targets for an inquiry. For instance, hydrofluosilicic acid does not appear on the Toxic Release Inventory list of chemicals, and there is a remarkable discrepancy among the Maximum Contaminant Levels for fluoride, arsenic and lead, given the relative toxicities of these substances.

**Surgeon General's Panel on Fluoride** We believe that EPA staff and managers should be called to testify, along with members of the 1983 Surgeon General's panel and officials of the Department of Human Services, to explain how the original recommendations of the Surgeon General's panel (16) were altered to allow EPA to set otherwise unjustifiable drinking water standards for fluoride.

**Kingston and Newburg, New York Results** In 1998, the results of a fifty-year fluoridation experiment involving Kingston, New York (un-fluoridated) and Newburg, New York (fluoridated) were published (17). In summary, there is no overall significant difference in rates of dental decay in children in the two cities, but children in the fluoridated city show significantly higher rates of dental fluorosis than children in the un-fluoridated city.

We believe that the authors of this study and representatives of the Centers For Disease Control and EPA should be called before a Select Committee to explain the increase in dental fluorosis among American children and the implications of that increase for skeletal and other effects as the children mature, including bone cancer, stress
Fractures and arthritis.

Findings of Fact by Judges In three landmark cases adjudicated since 1978 in Pennsylvania, Illinois and Texas (18), judges with no interest except finding fact and administering justice heard prolonged testimony from proponents and opponents of fluoridation and made dispassionate findings of fact. I cite one such instance here.

In November, 1978, Judge John Flaherty, now Chief Justice of the Supreme Court of Pennsylvania, issued findings in the case, Aitkenhead v. Borough of West View, tried before him in the Allegheny Court of Common Pleas. Testimony in the case filled 2800 transcript pages and fully elucidated the benefits and risks of water fluoridation as understood in 1978. Judge Flaherty issued an injunction against fluoridation in the case, but the injunction was overturned on jurisdictional grounds. His findings of fact were not disturbed by appellate action. Judge Flaherty, in a July, 1979 letter to the Mayor of Auckland New Zealand wrote the following about the case:

"In my view, the evidence is quite convincing that the addition of sodium fluoride to the public water supply at one part per million is extremely deleterious to the human body, and, a review of the evidence will disclose that there was no convincing evidence to the contrary...

"Prior to hearing this case, I gave the matter of fluoridation little, if any, thought, but I received quite an education, and noted that the proponents of fluoridation do nothing more than try to impune (sic) the objectivity of those who oppose fluoridation."

In the Illinois decision, Judge Ronald Niemann concludes: "This record is barren of any credible and reputable scientific epidemiological studies and or analysis of statistical data which would support the Illinois Legislature's determination that fluoridation of the water supplies is both a safe and effective means of promoting public health."

Judge Anthony Farris in Texas found: "[That] the artificial fluoridation of public water supplies, such as contemplated by {Houston} City ordinance No. 80-2530 may cause or contribute to the cause of cancer, genetic damage, intolerant reactions, and chronic toxicity, including dental mottling, in man; that the said artificial fluoridation may aggravate malnutrition and existing illness in man; and that the value of said artificial fluoridation is in some doubt as to reduction of tooth decay in man."

The significance of Judge Flaherty's statement and his and the other two judges' findings of fact is this: proponents of fluoridation are fond of reciting endorsement statements by authorities, such as those by CDC and the American Dental Association, both of which have long-standing commitments that are hard if not impossible to recant, on the safety and efficacy of fluoridation. Now come three truly independent servants of justice, the judges in these three cases, and they find that fluoridation of water supplies is not justified.

Proponents of fluoridation are absolutely right about one thing: there is no real controversy about fluoridation when the facts are heard by an open mind.

I am submitting a copy of the excerpted letter from Judge Flaherty and another letter referenced in it that was sent to Judge Flaherty by Dr. Peter Sammartino, then Chancellor of Fairleigh Dickenson University. I am also submitting a reprint copy of an article in the Spring 1999 issue of the Florida State University Journal of Land Use and Environmental Law by Jack Graham and Dr. Pierre Morin, titled "Highlights in North American Litigation During the Twentieth Century on Artificial Fluoridation of Public Water. Mr. Graham was chief litigator in the case before Judge Flaherty and in the other two cases (in Illinois and Texas).

We believe that Mr. Graham should be called before a Select Committee along with, if appropriate, the judges in these three cases who could relate their experience as trial judges in these cases.

Hydrofluosilicic Acid There are no chronic toxicity data on the predominant chemical, hydrofluosilicic acid and its sodium salt, used to fluoridate American communities. Newly published studies (19) indicate a link between use of these chemicals and elevated level of lead in children's blood and anti-social behavior. Material from the authors of these studies has been submitted by them independently.
We believe the authors of these papers and their critics should be called before a Select Committee to explain to you and the American people what these papers mean for continuation of the policy of fluoridation.

**Changing Views on Efficacy and Risk** In recent years, two prominent dental researchers who were leaders of the pro-fluoridation movement announced reversals of their former positions because they concluded that water fluoridation is not an effective means of reducing dental caries and that it poses serious risks to human health. The late Dr. John Colquhoun was Principal Dental Officer of Auckland, New Zealand, and he published his reasons for changing sides in 1997 (20). In 1999, Dr. Hardy Limeback, Head of Preventive Dentistry, University of Toronto, announced his change of views, then published a statement (21) dated April 2000. I am submitting a copy of Dr. Limeback's publications.

We believe that Dr. Limeback, along with fluoridation proponents who have not changed their minds, such as Drs. Ernest Newbrun and Herschel Horowitz, should be called before a Select Committee to testify on the reasons for their respective positions.

Thank you for you consideration, and I will be happy to take questions.

**CITATIONS**


8. Letters from government authorities in response to inquiries on fluoridation status by E. Albright. Eugene Albright; contact through J. W. Hirzy, P.O. Box 76082, Washington, D.C. 20013.


Coalition of U.S. Environmental Protection Agency Unions
Letter to U.S. Congress on Fluoride Regulation

The following letter was sent to the Chairmen and the Ranking Members of these Committees and Subcommittees of the U.S. Senate and House of Representatives, addressed to the Committee/Subcommittee offices. The remaining Members of these Committees/Subcommittees will then each receive a copy of the letter, transmitted by the respective Committee/Subcommittee majority and minority staffs. The letter was sent separately to Speaker of the House Hastert and to Rep. Henry Waxman. The names of chairmen and ranking members are listed below for each committee.

Senate Committees:
Environment and Public Works (Inhofe and Jeffords)
Health, Education, Labor and Pensions (Enzi and Kennedy)
Commerce, Science and Transportation (Stevens and Inouye)
Agriculture, Nutrition and Forestry (Chambliss and Harkin)

House Committees/Subcommittees
Energy and Commerce (Barton and Dingell)
  Subcommittee on Environment snd Hazardous Materials (Gillmor and Solis)
  Subcommittee on Health (Deal and Brown)
Science (Boehlert and Gordon)

August 5, 2005
RE: Bone Cancer-Fluoridation Cover-Up
Hon. Daniel Inouye, Ranking Member
Committee on Science and Transportation
560 Dirksen Senate Office Building
Washington, D.C. 20510-6125

Dear Senator Inouye:

Our unions represent a substantial portion of the nation-wide workforce at the U.S. Environmental Protection Agency, and we are writing to ask for a moratorium on the national program of the U.S. Public Health Service to fluoridate all of America’s public water supplies.

One of us (Dr. Hirzy, of NTEU Chapter 280) testified before the Subcommittee on Wildlife, Fisheries and Water of the Senate on June 29, 2000 on this subject on behalf of his headquarters union. At that time the union called for a moratorium based on science indicating a number of adverse health effects and out-of-control, excessive exposures to fluoride.

We now join NTEU Chapter 280 in renewing the call for a moratorium, based on startling and disturbing new information that confirms the worst fears expressed in the earlier testimony.

Work done at Harvard College’s School of Dental Medicine by Dr. Elise Bassin, which has been hidden since 2001, shows that pre-adolescent boys who drink fluoridated water are at a seven-fold increased risk of osteosarcoma, an often fatal bone cancer. We ask that the moratorium take effect immediately and remain in place until a full hearing by the Congress on the wisdom of continuing the practice is concluded. The last such hearing was in 1978.

Dr. Bassin’s work, done as her doctoral thesis, was completed and accepted by Harvard in partial fulfillment of
the requirements for her Ph.D. in 2001. It is a landmark investigation of age-specific exposure of young people in a case-control epidemiology study of the incidence of osteosarcoma. The thesis remained sequestered until 2004, when her research adviser, Chester Douglass, inexplicably reported to the funding agency, the National Institute of Environmental Health Sciences, that no connection was found between fluoride and osteosarcoma. This discrepancy between Chester Douglass’ written report and the actual findings of the funded study is under investigation by several entities, and we believe should be looked into by the Congress as well. It appears to be yet another instance of federally funded science gone awry to protect special interests. Chester Douglass edits Colgate Company’s Oral Health Report.

Chapter three of Dr. Bassin’s work (enclosed) cites the impressive weight of convergent evidence for the carcinogenicity of fluoride in young boys (but not girls): fluoride is a mitogen, increasing the rate of cell division; it has been shown to be mutagenic, damaging chromosomal structure; it accumulates primarily in bone, site of the cancer; several previous epidemiology studies have found heretofore unexplained increases in osteosarcoma in young men (but not young women); a National Toxicology Program animal study found statistically significant increases in osteosarcomas in male (but not female) rats. And she discusses why several other epidemiology studies found no association between fluoridation and osteosarcoma; principally, those studies did not consider age-specific exposures and development of the cancer.

It is simply unconscionable that her federally funded work was hidden for four years while millions of young boys continued to be exposed to increased risk of this disease, whose best outcome involves amputation. Several federal statutes express Congressional intent regarding timely warning about such risks. These include, for example, the Toxic Substances Control Act, section 8(e) and the Federal Insecticide, Fungicide and Rodenticide Act section 6(a)(2). We believe another area for Congressional investigation is: who knew about the results of Dr. Bassin’s work besides herself and Chester Douglass? and was any federal statute violated by keeping those results hidden for four years?

Another reason for a Congressional review of fluoridation is the recent work of Dr. Richard Maas of the Environmental Quality Institute, University of North Carolina-Ashville, which shows that use of chloramine disinfectant and silicofluoride fluoridating agents with excess ammonia increases lead concentrations in public water supplies. This may explain at least some of the increased lead levels seen in the District of Columbia’s water supplies and in the blood of children drinking water fluoridated with silicofluorides. The Centers for Disease Control and Prevention says that ninety four percent of fluoridated water systems use silicofluorides.

Dr. Hirzy is available to meet with your staff to pursue this matter, and we hope that you will find it of sufficient concern to initiate a full investigation of fluoridation, which we believe is long overdue.

Sincerely,

Dwight A. Welch, President
NTEU Chapter 280
EPA Headquarters

J. William Hirzy, Vice-President
NTEU 280
EPA Headquarters

/s/Steve Shapiro, President
AFGE local 3331
EPA Headquarters

/s/Paul Sacker, President
AFGE Local 3911
Region 2 Office, New York

/s/Larry Penley, President
NTEU Chapter 279

/s/Nancy Barron, President
NAGE Local R5-55
EPA Cincinnati Laboratory  
/s/Wendell Smith, President  
ESC/IFPTE Local 20  
Region 9 Office, San Francisco  
/s/Henry Burrell, President  
AFGE Local 3428  
Region 1 Office, Boston  
/s/Frank Beck, President  
AFGE Local 2900  
Ada Laboratory

Region 4 Office, Atlanta  
/s/Patrick Chan, President  
NTEU Chapter 295  
Region 9 Office, San Francisco  
/s/Alan Hollis, President  
AFGE Local 3611  
Region 3 Office, Philadelphia  
/s/Mark Coryell, President  
AFGE Local 3907  
Ann Arbor laboratory

c: Hon. Stephen L. Johnson, Administrator  
U.S. Environmental Protection Agency