

Coalition of U.S. Environmental Protection Agency Unions

August 5, 2005

RE: Bone Cancer-Fluoride Link

Hon. Stephen L. Johnson, Administrator

U.S. Environmental Protection Agency

Dear Administrator Johnson:

We, the undersigned representatives of a majority (eleven) of EPA's employee unions, are requesting that you direct the Office of Water to issue an Advanced Notice of Proposed Rulemaking setting the maximum contaminant level goal for fluoride at zero, in accordance with Agency policy for all likely or known human carcinogens. Our request is based on the overall weight of the evidence supporting the classification of fluoride as a human carcinogen, including new information from Harvard on the link between fluoride in drinking water and osteosarcoma in boys that was conveyed to you in a meeting with union officials on May 4, 2005.

We appreciate that the Agency anticipates a report next year from the National Research Council on the propriety of its current drinking water standards for fluoride. But it seems highly inappropriate for EPA to do nothing now that it is in possession of this science, while millions of young boys continue to be exposed unwittingly to the elevated risk of a fatal bone cancer as the Agency waits for the NRC to issue its report, then for the report to undergo peer review, and then for the Agency to undertake its own deliberations.

<>By issuing an Advanced Notice of Proposed Rulemaking the Agency would inform the public and local health authorities about the results of the doctoral dissertation from the Harvard School of Dental Medicine by Elise Bassin without committing the Agency to a formal rulemaking until all those other steps are taken.

It is noteworthy that when industry becomes aware of important new scientific findings like this, it has (depending on the specific statute) a very brief time to notify EPA. The Agency is then expected to take timely and appropriate action based on the specifics of that notification. In the present case EPA is aware of important new, high quality evidence of potentially serious danger to young boys drinking fluoridated water, and we believe EPA has an ethical duty to send an effective warning

immediately about this hazard.

It may in fact be appropriate for you to direct EPA's Office of Criminal Enforcement to investigate why Dr. Bassin's study, which was of sufficient quality for her to earn her doctoral degree, remained hidden from EPA for four years. Alternatively, you could request that the Department of Justice undertake the investigation.

As you know, the apparent cover up of the link between water fluoridation and a seven-fold increased risk of osteosarcoma in young boys, shown by the research of Dr. Bassin, is now national news. Major newspapers, including the *Washington Post* and the *Wall Street Journal* have covered the story. The Environmental Working Group has petitioned the National Toxicology Program to classify fluoride as a human carcinogen based in part on Dr. Bassin's work. (We recommend EWG's petition as a succinct and authoritative overview of the total weight of peer-reviewed evidence supporting the classification of fluoride as a human carcinogen.) EWG has also caused an investigation of the cover up to be started by Harvard and NIEHS, which funded the research.

The eyes of the nation are on the federal science establishment because of a host of scientific integrity issues. Former EPA Assistant Administrator Lynn Goldman and Roni Neff have just published a paper in the *American Journal of Public Health* on the cost of delayed adoption of health-protective standards that illuminates the real public health costs of the government's failure to act on sound scientific evidence.

We believe our Agency can make an important statement about its commitment to scientific integrity and its application to public health protection by taking the precautionary action we are recommending.

We at EPA can be ahead of the curve on this important issue or behind it. We do not think the latter choice is in the best interest of the public, the Civil Service or EPA, and we fervently and respectfully hope that you will agree with us. As a wise man once said, "The science is what the science is."

We will be happy to discuss this with you and your advisers at your convenience.

Sincerely,

Dwight A. Welch, President
Hirzy, Vice-President

J. William

NTEU Chapter 280

NTEU

280

EPA Headquarters

EPA Headquarters

/s/Steve Shapiro, President
President

/s/Paul Sacker,

AFGE local 3331

AFGE Local 3911

EPA Headquarters
New York

Region 2 Office,

/s/Larry Penley, President
President

/s/Nancy Barron,

NTEU Chapter 279

NAGE Local R5-55

EPA Cincinnati Laboratory
Atlanta

Region 4 Office,

/s/Wendell Smith, President
President

/s/Patrick Chan,

ESC/IFPTE Local 20

NTEU Chapter 295

Region 9 Office, San Francisco
Francisco

Region 9 Office, San

/s/Henry Burrell, President
President

/s/Alan Hollis,

AFGE Local 3428
3611

AFGE Local

Region 1 Office, Boston
Office, Philadelphia

Region 3

/s/Frank Beck, President
President

/s/Mark Coryell,

AFGE Local 2900
3907

AFGE Local

Ada Laboratory
Laboratory

Ann Arbor

cc:

Sen. James Inhofe

Sen. James Jeffords

Sen. Mike Enzi

Sen. Edward Kennedy

Sen. Saxby Chambliss

Sen. Tom Harkin

Sen. Ted Stevens

Sen. Daniel Inouye

Rep. Joe Barton

Rep. John Dingell

Rep. Sherwood Boehlert

Rep. Bart Gordon

Rep. Paul Gillmor

Rep. Hilda Solis

Rep. Nathan Deal

Rep. Sherrod Brown

Rep. Henry Waxman

Read & Sign Citizens PETITION at: <http://petition.powalliance.org/index.html>

[Fluoridation: Recent History](#)

[2003 STATEMENT OF CONCERN](#)

[DOCUMENTATION OF 2003 STATEMENT OF CONCERN](#)

[OFFICIAL SENATE TESTIMONY ON FLUORIDE](#)

[2005 LETTER TO CONGRESS](#)

[Subscribe](#) to the OraMedia Newsletter for Dental Self Sufficiency

[OraMedia Home](#) | [Articles on Gum Disease](#) | [Newsletter Archive](#) | [Dr. Robert O. Nara](#)

[Interview: Freedom From Dental Disease](#) | [Healthy Teeth and Gums](#) | [3 Steps to Acheiving Proper Oral Health](#) | [Let your Teeth Heal Themselves](#) | [How to Eliminate the Dentist From Your Life](#) | [Healthy Teeth in Children](#) | [FAQ - Frequently Asked Questions](#) | [Q&A With a Periodontal Patient](#) | [Make Your Own Toothpaste](#) | [What Are You Brushing With? \(Make your Own Toothpaste Part 2\)](#)

[Subscribe to the OraMedia Newsletter](#)

[OraMedia Products; Oral Irrigators, Floss, Mouth Rinse, OraMD, Maxiumum Teeth Whitening... Bad Breath and Gingivitis](#) | [Is Your Dentist Taking Shortcuts?](#) | [How to Become Dentally Self Sufficient](#)

[Feelings!](#) | [Principles of the Seven Factors for Keeping Your Teeth Healthy for Life](#) | [Venus, Mars and Oral Hygiene](#) | [Via Jet Pro](#) | [TheraSol](#) | [Glide Floss](#) | [OraMD](#) | [Maximum Teeth Whitening](#) | [BANA Test](#) | [10 Tips for Keeping Your Teeth Healthy for Life!](#) | [OraMedia Newsletter Advertizing](#) | [Take Bad Breath Seriously](#) | [Behavioral Effects of Fluorides on Mass Populations](#) | [What is the Best Way to Purify My Water?](#) | [Liquid Minerals](#) | [Sonicare Elite Bonus Pack 7700](#)