



MAY 25 1988

Ms. Thelma Martindale
Secretary/Treasurer
Hawaii Anti-Fluoridation League
PO Box 15638
Honolulu, Hawaii 96815

Dear Ms. Martindale,

Thank you for your letter on the fluoride in drinking water regulation and the attached information on fluoride.

I am afraid that I have little scientific information to add to the considerable material which you have already acquired. What I can give you are some of the letters which the professional union has sent to the Administrator and other officials of EPA. These letters document our concern with the scientific validity of the regulation of fluoride in drinking water. In our letter of Nov. 15, 1985 to Mr. Lee Thomas, EPA Administrator, we said:

- (1) "...the literature review missed significant reports in the published literature."
- (2) "...references were used that did not address the subject as claimed."
- (3) "...scientific conclusions were made without appropriate documentation and which contradict the available evidence."
- (4) "...EPA documents on fluoride appear designed to 'support' the Agency position rather than assess the risks from a scientific data base."

None of these statements has been adequately refuted by EPA management. Our last point is particularly telling because it appears to us that a conclusion was made to raise the level of fluoride considered safe before the safety of fluoride was investigated. The scientific documents were apparently "cooked" to produce the desired outcome. This procedure is contrary to the most basic ethical principles of science.

What you have in the EPA standard is not science, but politics of the worst kind. Our position is that EPA needs to go back to the drawing board and do the analysis in an honest objective manner without preconceived ideas about the outcome. It would be very helpful if you asked EPA (through your Congressional representatives) to do this.

You might point out to your Congressional representatives that EPA is required by the amendments to the Safe Drinking Water Act to review the standards every three years. Since the standard for fluoride was published in November of 1985, now would be a good time to demand that EPA do the review and get the analysis done properly.

Sincerely,


Robert J. Carton, Ph.D.
Secretary
NFFE Local 2050