



APR 27 1989

Hon. William K. Reilly
Administrator
U.S. Environmental Protection Agency
Washington, D.C. 20460

Dear Mr. Reilly,

Through this letter, the National Federation of Federal Employees Local 2050 (NFFE) is bringing to your attention the results of an analysis by Dr. John Yiamouyiannis, a well known fluoride expert, which calls into question the utility of fluoridation of drinking water in helping prevent dental caries. EPA is on record in support of drinking water fluoridation for this purpose, a position which it now appears must be reassessed in light of Dr. Yiamouyiannis' analysis.

Dr. Yiamouyiannis recently completed his analysis of the largest data base ever compiled on the prevalence of tooth decay in the U.S., data which he obtained under the Freedom of Information Act from the National Institute of Dental Research. He found that the average tooth decay rate of children, ages 5 to 17, in fluoridated areas was essentially identical to the tooth decay rate of children in non-fluoridated areas. The data were part of a survey by NIDR of over 40,000 U.S. children taken during 1986-87.

Dr. Yiamouyiannis will release the results of this analysis at the National Press Club on Monday, May 1, 1989. This information and recent studies in foreign countries demonstrating declines in tooth decay without fluoridation should enable EPA to reassess its support for this practice.

NFFE has been concerned for some time that the risks and benefits of fluoride exposure have not been honestly evaluated. As recently revealed in the Medical Tribune (April 20, 1989) (Attached), experts convened by the Surgeon General to review the health effects of fluoride exposure for EPA in 1983, said in private session: "If we were just handling this as an environmental contaminant, we could say we begin to see fluorosis at 2 ppm." They then went on to say that their recommendation would be to add a safety factor and set the safe level at 0.5 ppm. They agreed, however, that "We can't just talk about safety."

The Union objected in 1986 when EPA bowed to pressure from the Public Health Service and raised the level in drinking water considered to be safe to 4.0 ppm, against the advice of its own professional staff. To support this decision, EPA relied upon the PHS, which had an obvious conflict of interest in justifying its longstanding promotion of fluoridation. NFFE believes that EPA's decision to raise the "safe" level in drinking water was made solely to make it easier to convince the public to add fluoride to their drinking water. Absent this pressure, we believe that the "safe" level would have been lowered instead of raised.

NFFE has been told by a management official in the Office of Drinking Water that despite the requirements of the law to review the scientific basis for drinking water regulations every three years, no such review for the 1986 fluoride Maximum Contaminant Level Goal will be undertaken unless EPA is sued. This position is an affront to every EPA employee sworn to uphold the laws of the Nation; we cannot believe that you concur with it.

We respectfully request that you:

- (1) immediately suspend (not revoke) EPA's unqualified support for fluoridation, and
- (2) begin an assessment, by EPA scientists, of the risks and benefits of fluoride exposure.

This work should include a full analysis of each health effect and exposure situation at issue.

You have communicated to us--and we are in complete accord with--your desire for professionalism and first-rate science to drive EPA's actions. This issue is a perfect place for us to demonstrate our mutual commitment to these principles.

Sincerely,

J. William Hirzy, Ph.D.
President, NFFE Local 2050