

August 8, 1986

RESOLUTION

*By Executive Board
NFFE Local 2050*

WHEREAS

EPA has promulgated a Recommended Maximum Contaminant Level (RMCL) for fluoride in drinking water which according to law must be set at a level that assures that

"no known or anticipated adverse effects on the health of persons occur and which allows an adequate margin of safety,"

WHEREAS

This RMCL has been based on scientific and technical support documents whose content and interpretation are open to question,

to wit, these documents:

-contain numerous factual errors and omissions critical to the conclusions arising from the lack of reviews by professionals having specialized qualifications in areas of study.

-contain inappropriate assessments of the significance of scientific findings because the criteria for judgement is not in accord with legal requirements.

-reject the opinion of an outstanding committee of mental health experts who had asserted the health significance of dental fluorosis as did the Surgeon General's advisory group.

WHEREAS

The reputations of EPA professionals are based on producing scientifically and technically sound support documents that support the mission of the Agency,

WHEREAS

The code of conduct for government employees requires that they adhere to principle and work in the public interest,

WHEREAS

This Union of EPA professionals has repeatedly attempted to have the Agency reconsider promulgating this fluoride regulation,

WHEREAS

The above requires this union of EPA professionals to oppose the Agency's decision on fluoride,

BE IT RESOLVED THAT:

NFFE Local 2050 agrees:

To request the EPA Science Advisory Board to review the scientific and technical support documents for the RMCL for fluoride in drinking water according to the requirements of the law, and request the Agency to abide by the findings.

Failing a timely response by the SAB,

To prepare and submit a brief to the court as an injured party in support of the NRDC suit by 9/3/86. The purpose of the suit will be to have the RMCL withdrawn and to have a thorough review of the scientific and technical literature on fluoride conducted by experts according to the requirements of the law.

These requirements are understood to mean that the RMCL should protect all people, regardless of their drinking water habits, taking into account susceptible groups, with an adequate margin of safety. If there is adequate reason to ~~be~~ believe that a health effect may occur from a certain level of fluoride exposure, then this health effect should be included.