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March 29, 2000

Food & Drug Administration  
5630 Fishers Lane, Rm 1061  
Dockets Management Branch HFA-305  
Rockville MD 20852

SUBJECT: FLUORIDATION

Gentlemen:

Enclosed is a copy of a letter we wrote recently to legislators on the broad subject of fluoridation of our water supplies. The lack of disclosure of contents of same is abhorrent and unconscionable. The people have no way of knowing how to vote—for or against fluoride. Why hasn't the FDA come out with a statement regarding the potential harms of these poisons when ingested over a long period of time? The cumulative properties of the poisonous toxic soup and its catastrophic effects on the human body should be told to the unsuspecting public. The dentists don't know about toxicity, therefore they continue spreading misinformation about its glories without a mention of the warnings which appear on fluoride toothpaste.

**Labeling should be large and explicit with all ingredients listed--fluorosilicic acid, lead, arsenic and radium—all of them carcinogenic. They should use a skull and crossbones and "drink at your own risk and do not allow your children to consume." A Dartmouth College study proves the combination of fluoride and lead causes violence and substance abuse in children, something to do with the pineal gland. Also it may lower their IQ's according to the document released in May 1999 by J William Hirzy, Ph.D., Senior VP, National Treasury Union of EPA scientists.**

What will you do about all of the other products containing these same chemicals such as juices, soft drinks, beer, wines, coffee, tea, canned fruits, rice milk, soy milk, canned soups and anything else canned with fluoridated water added? What about eating out in restaurants? Should they be required to post a disclaimer?

What about water bills? They certainly should show the poisonous content so the people would have a choice of drinking or not drinking water that may be hazardous to their health!

**The easy solution would be to ban the sale of this toxic soup pollution which is currently being put into the unsuspecting citizens' water. What possible conceivable right would anyone have to use our precious drinking water as a sewer for hazardous waste? Under the statutes of the SDWA (Safe Drinking Water Act), federal agencies are forbidden from endorsing, supporting or funding the practice of adding any chemicals to the water other than for purposes of water purification.** The scurrilous people who are selling this are playing on the ignorance of gullible small-minded city officials.

Sincerely,



Gloria K. Lamb



Eugene F. Lamb

Encls

99P-0795

C B

1415 Madrona Pt. Dr.  
Bremerton, Washington 98312  
March 16, 2000

Dear Senator

EDUCATE, don't FLUORIDATE!

Cities all over the United States purchase hundreds of thousands of gallons of pollution concentrate from Florida, fluorosilicic acid, to fluoridate tap water.

Fluoridating drinking water with recovered pollution is a cost-effective means of disposing of toxic wastes. Cost effective only for the phosphate fertilizer companies who would otherwise have to dispose of it as hazardous waste. Fluorosilicic acid is a toxic substance that poses a most significant risk to human health and the greatest potential liability for manufacturers.

They use a broad disclaimer on the *Material Data Safety Sheet* that states: "no responsibility can be assumed by vendor for any damage or injury resulting from abnormal use, from any failure to adhere to recommended practices, or from any hazards inherent to the product."

The next time you turn on the water tap, reflect on the following disclaimer from the EPA's 1997 Fluoride Regulatory Fact Sheet: "In the United States, there are no Federal safety standards which are applicable to additives, including those for use in fluoridating drinking water."

Technically, artificially fluoridating drinking water is a violation of the Safe Drinking Water Act (SDWA). **Under statutes of the SWDA, Federal agencies are forbidden from endorsing, supporting, requiring or funding the practice of adding any chemicals to the water supply other than for purposes of water purification. However, the Public Health Service (PHS) applies semantics to circumvent Federal law in order to promote and fund the practice. Why are you allowing them to do this? Why are they not required to tell the dangers of this "toxic soup"?**

PHS states that they only recommend levels of fluoride in the drinking water, and it is the sole decision of a state or community to fluoridate drinking water. That's just great, passing the responsibility on to the state or community but not telling the whole story of the cumulative health dangers!

Federal agencies are forbidden from directly funding or implementing water fluoridation but Federal Block Grants are given to States "to use as they see fit". WE WANT THESE FEDERAL GRANTS TO BE STOPPED!

We want the American Dental Association to cease and desist their false advertising of the "benefits to children's teeth" from these additive poisons which have been proven in study after study to be untrue. Twenty three percent of the children in fluoridated communities have fluorosis. In Canada they are now spending more money treating dental fluorosis than they do treating cavities. Cavity rates are low all across the industrialized world, including Europe, which is 98% fluoride free--low because of improved standards of living, less refined sugar, regular dental check-ups, flossing and frequent brushing.

We want PHS to stop encouraging communities to apply for Federal Block Grant funds to implement fluoridation. They should, instead, be shouting the truth about cumulative toxicity and its catastrophic effects on the human body!

**YOU, the lawmakers, should be held responsible. All that you need do would be to make it illegal to sell the poison and force the industries to dispose of it as the hazardous waste that it is, as prescribed on the Superfund Priorities List.**

**We are extremely unhappy to learn that Federal and State pollution regulations have been "modified" to accommodate phosphate production and use; that these regulations have included using recovered pollution for water fluoridation. Pardon me, but this was an unforgivable mistake which needs to be rectified and sooner rather than later.** "Fluoride is the greatest case of fraud of this century--if not all time," states Dr. Robert Carlson, a U.S. EPA scientist.

West Central Florida is one of the most polluted areas in the nation, including their rivers and streams. Florida has become a toxic dump for phosphate fertilizer manufacturers. People living near the fertilizer plants and mines experience lung and cancer rates that are double the state average.

As long as Congress panders to industry, the poisoning of 130,000,000 unsuspecting Americans continues. What are you going to do and when do you plan to do it?

We also need some labeling laws on any product, food and drink, containing fluoride and including every water bill to every citizen being poisoned every day with each glass of water ingested containing fluoride, lead, arsenic and radium - all of them carcinogenic!

Do you know that France won't import California wine because of its high fluoride content? In California they spray the grapes with fluoride, a chemical insecticide.

For confirmation on any of the above, please contact:

J. William Hirzy, PhD, Senior VP  
National Treasury Union, Chapter 280  
Tel: 202-260-4683  
E-mail: [hirzy.john@epa.gov](mailto:hirzy.john@epa.gov)

Sincerely,



Gloria K. Lamb

Eugene F. Lamb

Encls

**P.S. In lieu of this new "BIG HEALTH RISK" material from chemist, George Glasser (attachment) my husband and I strongly recommend that SSB 6665 be junked. We believe that it should not be a legislative decision.**

## FLUORIDE AND THE PHOSPHATE CONNECTION

By George C. Glasser

Cities all over the US purchase hundreds of thousands of gallons of fresh pollution concentrate from Florida - fluorosilicic acid ( $H_2SiF_6$ ) - to fluoridate water.

Fluorosilicic acid is composed of tetrafluorosilicate gas and other species of fluorine gases captured in pollution scrubbers and concentrated into a 23% solution during wet process phosphate fertilizer manufacture. Generally, the acid is stored in outdoor cooling ponds before being shipped to US cities to artificially fluoridate drinking water.

Fluoridating drinking water with recovered pollution is a cost-effective means of disposing of toxic waste. The fluorosilicic acid would otherwise be classified as a hazardous toxic waste on the Superfund Priorities List of toxic substances that pose the most significant risk to human health and the greatest potential liability for manufacturers.

Phosphate fertilizer suppliers have more than \$10 billion invested in production and mining facilities in Florida. Phosphate fertilizer production accounts for \$800 million in wages per year. Florida's mines produce 30% of the world supply and 75% of the US supply of phosphate fertilizers. Much of the country's supply of fluorosilicic acid for water fluoridation is also produced in Florida.

Phosphate fertilizer manufacturing and mining are not environment friendly operations. Fluorides and radionuclides are the primary toxic pollutants from the manufacture of phosphate fertilizer in Central Florida. People living near the fertilizer plants and mines experience lung cancer and leukemia rates that are double the state average. Much of West Central Florida has become a toxic waste dump for phosphate fertilizer manufacturers. Federal and state pollution regulations have been modified to accommodate phosphate fertilizer production and use. These regulations have included using recovered pollution for water fluoridation.

Radium wastes from filtration systems at phosphate fertilizer facilities are among the most radioactive types of naturally occurring radioactive material (NORM) wastes. The radium wastes are so concentrated, they cannot be disposed of at the one US landfill licensed to accept NORM wastes, so manufacturers dump the radioactive wastes in acidic ponds atop 200-foot-high gypsum stacks. The federal government has no rules for its disposal.

During the late 1960s, fluorine emissions were damaging crops, killing fish and causing crippling skeletal fluorosis in livestock. The EPA became concerned and enforced regulations requiring manufacturers to install pollution scrubbers. At that time, the facilities were dumping the concentrated pollution directly into waterways leading into Tampa Bay.

### A PHOSPHATE WORSE THAN DEATH

In the late 1960s, EPA chemist Ervin Bellack worked out the ideal solution to a monumental pollution problem. Because recovered phosphate fertilizer manufacturing waste contain about 19% fluorine, Bellack concluded that the concentrated "scrubber liquor" could be a perfect water fluoridation agent. It was a liquid and easily soluble in water, unlike sodium fluoride - a waste product from aluminum manufacturing. It was also inexpensive.

Fate also intervened. The aluminum industry, which previously supplied sodium fluoride for water fluoridation, was facing a shortage of fluorspar used in smelting aluminum. Consequently, there was a shortage of sodium fluoride to fluoridate drinking water. For the phosphate fertilizer industry, the shortage of sodium fluoride was.

the key to turning red ink into black and an environmental liability into a perceived asset. With the help of the EPA, fluorosilicic acid was transformed from a concentrated toxic waste and a liability into a "proven cavity fighter."

The EPA and the US Public Health Service waived all testing procedures and - with the help of the American Dental Association (ADA) - encouraged cities to add the radioactive concentrate into America's drinking water as an "improved" form of fluoride.

The product is not "fluorine" or "fluoride" as proponents state: It is a pollution concentrate. Fluorine is only one captured pollutant comprising about 19% of the total product.

By 1983, the official EPA policy was expressed by EPA Office of Water Deputy Administrator Rebecca Hanmer as follows: "In regard to the use of fluosilicic (fluorosilicic) acid as a source of fluoride for fluoridation, this agency regards such use as an ideal environmental solution to a long-standing problem. By recovering by-product fluosilicic acid from fertilizer manufacturing, water and air pollution are minimized, and water utilities have a low-cost source of fluoride available to them."

### A HOT NEW PROPERTY

In promoting the use of the pollution concentrate as a fluoridation agent, the ADA, Federal agencies and manufacturers failed to mention that it was radioactive. Whenever uranium is found in nature as a component of a mineral, a host of other radionuclides are always found in the mineral in various stages of decay. Uranium and all of its decay-rate products are found in phosphate rock, fluorosilicic acid and phosphate fertilizer.

During wet-process manufacturing, trace amounts of radium and uranium are captured in the pollution scrubber. This process was the subject of an article by H.F. Denzinger, H. J. König and G.E. Krüger in the fertilizer industry journal, Phosphorus & Potassium (No. 103, Sept./Oct. 1979) discussed how radionuclides are carried into the fluorosilicic acid.

While the uranium and radium in fluorosilicic acid are known carcinogens, two decay products of uranium are even more carcinogenic: radon-222 and polonium-210.

During the acidulation process that creates phosphoric acid, radon gas contained in the phosphate pebble can be released in greater proportions than other decay-rate products (radionuclides) and carried over into the fluorosilicic acid. Polonium may also be captured in greater quantities during scrubbing operations because, like radon, it can readily combine with fluoride.

In written communications to the author, EPA Office of Drinking Water official Joseph A. Cotruvo and Public Health Service fluoridation engineer Thomas Reeves have acknowledged the presence of radionuclides in fluorosilicic acid.

Radon-222 is not an immediate threat because it stops emitting alpha radiation and decays into lead-214 in 3.86 days. Lead-214 appears to be harmless but it eventually decays into bismuth-214 and then into polonium-214. Unless someone knew to look for specific isotopes, no one would know that a transmutation into the polonium isotope had occurred. Polonium-210, a decay product of bismuth-210, has a half-life of 138 days and gives off intense alpha radiation as it decays into regular lead and becomes stable. Any polonium-210 that might be present in the phosphate concentrate could pose a significant health threat. A very small amount of polonium-210 can be very dangerous, giving off 5,000 times more alpha radiation than the same amount of radium. As little as 0.03 microcuries (6.8 trillionths of a gram) of polonium-210 can be carcinogenic to humans. The lead isotope behaves like calcium in the body. It may be stored in the bones for years before turning into polonium-210 and triggering a

carcinogenic release of alpha radiation.

Drinking water fluoridated with fluorosilicic acid contains radon at every sequence of its decay to polonium. The fresher the pollution concentrate, the more polonium it will contain.

As long as the amount of contaminants added to the drinking water (including radionuclides in fluorosilicic acid) do not exceed the limits set forth in the Safe Drinking Water Act, the EPA has no regulatory problem with the use of any contaminated products for drinking water treatment.

**BIG RISKS: NO TESTS**

Despite the increased cancer risk from using phosphate waste to fluoridate drinking water, the EPA nor the Centers for Disease Control have never commissioned or required any clinical studies with the pollution concentrate - specifically, the hexafluorsilicate radical whose toxicokinetic properties are different than the lone, fluoride ion. Section 104 (l) (5) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) directs the Toxic Substances and Disease Registry, the EPA, the Public Health Service and the National Toxicology Program to initiate a program of research on fluoride safety. However, after almost 30 years of using fluorosilicic acid and sodium fluorosilicate to fluoridate the drinking water, not one study has been commissioned.

The fluoride ion only hypothetically exists as an entity in an ideal solution of purified water - and tap water is far from pure H2O. All clinical research with animal models is done using 99.97% pure sodium fluoride and double distilled or deionized water. Among the thousands of clinical studies about fluoride, not one has been done with the pollution concentrate or typical tap water containing fluorides.

**SYNERGY SOUP**

The fluorosilicic acid is also contaminated with small traces of arsenic, cadmium, mercury, lead, sulfates, iron and phosphorous, not to mention radionuclides. Some contaminants have the potential to react with the hexafluorsilicate radical and may act as complex ionic compounds. The biological fates and toxicokinetic properties of these complex ions are unknown.

The reality of artificial water fluoridation is so complex that determining the safety of the practice may be impossible. Tap water is chemically treated with chlorine, soluble silicates, phosphate polymers and many other chemicals. In addition, the source water itself may contain a variety of contaminants.

The addition of a fluoridation agent can create synergized toxicants in a water supply that have unique toxicokinetic properties found only in that particular water supply. Consequently, any maladies resulting from chronic ingestion of the product likely would be dismissed as a local or regional anomaly unrelated to water fluoridation. Technically, artificially fluoridating drinking water is a violation of the Safe Drinking Water Act (SDWA). Under statutes of the SDWA, federal agencies are forbidden from endorsing, supporting, requiring or funding the practice of adding any chemicals to the water supply other than for purposes of water purification. However, the Public Health Service (PHS) applies semantics to circumvent Federal law in order to promote and fund the practice.

PHS states that they only recommend levels of fluorides in the drinking water, and it is the sole decision of a state or community to fluoridate drinking water.

Federal agencies are forbidden from directly funding or implementing water fluoridation but Federal Block Grants are given to States to use as they see fit.

Through second and third parties (such as the American Dental Association, state health departments and state fluoridation coordinators), PHS encourages communities to apply for Federal Block Grant funds to implement fluoridation.

The legality of using Federal Block Grant funds to fund water fluoridation, a practice prohibited by Federal law, has never been addressed in the courts.

Vendors selling the pollution concentrate as a fluoridation agent use a broad disclaimer found on the Material Data Safety Sheet that states: "no responsibility can be assumed by vendor for any damage or injury resulting from abnormal use, from any failure to adhere to recommended practices, or from any hazards inherent to the product." [Emphasis added.]

The next time you turn on the tap and water gushes out into a glass, reflect on the following disclaimer from the EPA's 1997 Fluoride Regulatory Fact Sheet: "In the United States, there are no Federal safety standards which are applicable to additives, including those for use in fluoridating drinking water."

George Glasser is a Florida-based writer whose work has appeared in Newlife, Whole Life Times, the Sarasota ECO Report and the Tampa Tribune.

Since April 1998, Chapter 280 of the National Treasury Employee's Union took a stance opposing fluoridation of drinking water supplies. This Union represents 1,500 scientists, lawyers and engineers at EPA headquarters in Washington, D. C.

Like most Americans, their members thought that fluoride's only effects were beneficial reductions in tooth decay etc. Their opposition to fluoride has grown based on scientific literature documenting increasingly out-of-control exposures to fluoride, the lack of benefit to dental health from ingestion of fluoride and the hazards to human health.

These hazards include:

- Acute toxic hazards to people with impaired kidney function
- Gene mutations
- Cancer
- Reproductive effects
- Brittle teeth and bones
- Dental fluorosis
- Decreased IQ in children
- Interference with the function of the brain's pineal gland

That at least 22% of America's children now have dental fluorosis is just one indication of uncontrolled, excessive exposure. In the face of current levels of over-exposure coupled with increasing adverse toxicity findings, to continue to push for more exposure would be irrational and irresponsible at best.

Their union has taken a giant step to protect the employees they represent from the risks of drinking fluoridated water. They figured the amount of fluoride presently being added to the public drinking water supply to be more than 100 times the Reference Dose. On this basis, the union filed a grievance asking for unfluoridated water in their workplace.

The implication for the general public should be clear. Recent peer-reviewed toxicity data, when applied to EPA's standard method for controlling risks from toxic chemicals, requires an immediate halt to the use of the nation's drinking water as disposal sites for the toxic waste of the phosphate fertilizer industry.

Citizens for Safe Water

Gloria Knox Lamb Gloria Knox Lamb

Eugene F. Lamb Eugene F. Lamb

Mr. & Mrs. E. F. Lamb  
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