

NTEU CHAPTER 280 - U.S. ENVIRONMENTAL PROTECTION AGENCY, NATIONAL
HEADQUARTERS
BEN FRANKLIN STATION, BOX 7672, WASHINGTON D.C. 20044 - PHONE 202-566-2789
INTERNET <http://www.nteu280.org> E MAIL Al-Mudallal.Amer@epa.gov

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Inside The Fishbowl

Official Newsletter of NTEU 280

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PRESIDENT:	Dr. James J. Murphy	566-2786
EXECUTIVE VICE PRESIDENT:	Dwight Welch	566-2787
SENIOR VICE PRESIDENT	Dr. J. William Hirzy	566-2788
CHIEF STEWARD	Rosezella Canty-Letsome	566-2784
VICE PRESIDENTS	Linda Barr	(703) 605-0768
	Dr. Arthur Chiu, M.D.	564-3296
	William (Bill) Garetz	566-0334
	Dr. Richard Nalesnik	564-6889
	Dr. Freshteh Toghrol	(410) 305-2755
SECRETARY	Jacqueline Rose	566-1232
TREASURER	Dr. Bernard Schneider	(703) 305-5555
EDITOR	Seth Thomas Low	(703) 603-9087
MAIN UNION NUMBER		(202) 566-2785

QUOTE OF THE MONTH

From Paul O'Neill, Treasury Secretary

"We call our people 'human resources' or 'human capital' as if people are some kind of purchasing alternative to desktop computers and laser printers. That's not just offensive, it's wrong"

Pithy Points

A “Reality Check” – Badly Needed?

EPA has a “MISSION.” It has a “VISION.” It has strategies, plans, objectives, and goals. Are its employees impressed? Is the public impressed? With over 18,000 EPA staff in Headquarters and the Regions, someone should be impressed. The reality check is where the rubber meets the road. Let’s keep it simple and report quarterly, state-by-state, what we are doing to secure pure drinking water, to protect erosion of our agricultural lands, to purify our air, to contain toxic and hazardous materials, and secure the quality of our rivers, streams, and recreational areas for our growing population. Can some national policy genius take just a little more time and effort to communicate with us (7th to 8th grade level) customers? We’d appreciate it.

Performance Metrics – A Great Unknown

EPA knows how to conduct sophisticated “risk assessments”, but it doesn’t do very well in measuring the value and utility of its program accomplishments. The Agency seems to be having serious difficulty in meeting performance measures demanded by the OMB through Circular A-11 which insists on wringing the “bull” out of political rhetoric and amateurish, meaningless statistics. Judgement Day is coming. Better get cracking.

Work Force Analysis – Farce!

Does management know what talent is in residence at EPA? Probably not. Why? No one seems to care. EPA’s institutional capabilities are at best poorly known and rarely celebrated. Hollow honors and awards continue to be granted on schedule and with unconvincing impact. We operate like a “candy shop” for personal appeasement without programmatic purpose. EPA doesn’t know who and/or what they have. Management knows even less of what EPA needs now and in the near future. But, don’t worry, Thanksgiving and Christmas are coming, the geese are getting fat, and there will be plenty “turkeys” around for future assignment.

Executive Mobility – At Your Convenience!!

Contrary to popular opinion and expectations for a major executive cleanup of pseudo managers and inherited previous administration policy dead-heads, our disappointment continues. Less than 35 out of an Agency ceiling of 293 executive positions have been “mobilized”/disturbed from their complacency and convenience. It’s taken almost 2 years for this administration to make a commitment to change and achieve such meager results. In fact, some program dead-heads were promoted in the process and little, if any, benefit has accrued to program operations throughout the Agency. If this is an example of enlightened and aggressive leadership, we are truly insulted. Oh, well, maybe executive leadership and accountability isn’t a priority for our Administrator and Deputy Administrator. With our high and hopeful expectations ... the joke’s on us.

Announcements

The Combined Federal Campaign (CFC) will kick off some time between the first of September and December 15 and will run for six weeks. Please consider contributing to the Federal Education and Assistance Fund (FEEA), which has an admirable record of helping federal employees and their families with scholarships (more than \$3.5 million) and financial aid in natural and unnatural disasters, such as floods, hurricanes, the Oklahoma City bombing and the attacks on the Pentagon and World Trade Center (over \$3 million). Check your CFC catalog. (The last we looked, FEEA was CFC #1234. That would certainly be an easy number to remember, and they are worthy of our support.)

Another worthy organization to support is the Government Accountability Project. (No. 0861, see page 94) The Government Accountability (GAP) Project helps whistle-blowers who expose waste, fraud, abuse, and mismanagement in government. GAP has gone to bat and won to help a significant number of EPA whistle-blowers.

The NTEU Spring 2003 National Training Conference Schedule was announced on September 19, for those of you who like to plan ahead. There will be a session on March 18-20 in Arlington, VA. The usual audience is Union officers and stewards, with different tracks for persons with different degrees of experience. The factual material is valuable. The chance to network with Union leaders from other agencies and NTEU National, and realize that "you are not alone," is priceless. [apologies to some TV commercial whose cuteness has outrun the product it was selling]

NTEU National President Colleen Kelley deplored double-digit increases in health insurance premiums, noting that federal employees may not be deciding which health insurance plan they want to belong to, but rather whether they can afford any insurance at all. NTEU supports bills to raise the government's share of employees' health insurance premiums from the current average of 72% to 80%. These are H.R. 1307 in the House of Representatives, and S. 1982 in the Senate.

From the Chapter President — Jim Murphy

Caveat on MetLife Insurance Company Solicitations

National President Colleen Kelley advises that NTEU has not endorsed any program offered by MetLife Insurance and has no business relationship with this company. Solicitations on behalf of MetLife have been made of NTEU members through "cold calls," asking various questions of a personal nature. The companies that NTEU endorses do not "cold call" members to sell insurance, and personal information should be given only after a member has elected a service.

Kelly Speaks Out on Health Costs

Kelley cautioned that a new health spending account from the American Postal Workers Union (similar to Medical Savings Accounts, MSAs) that would provide \$1000 for an individual and \$2000 for a family, but would leave an out-of-pocket gap after these amounts are used up, before insurance coverage would kick in again. Kelley noted that a plan like this would appeal to younger and healthier workers, but that separating younger workers from older ones might result in even steeper increases in health insurance premiums in the future in traditional programs. MSAs seem designed to reward people for not using health services. Over the long haul, this doesn't work.

Colleen Kelley praised the government's expanding the use of pre-tax dollars, which have been used for health-insurance premiums, to set-asides for other medical and dependent-care expenses, through Flexible Spending Accounts (FSAs, not to be confused with MSAs). The Office of Personnel Management (OPM) has announced that starting in July 2003, federal workers may have up to \$3000 withheld from their paychecks for out-of-pocket medical expenses that are not covered by insurance (such as deductibles, co-pays, vision care or orthodontia), and up to \$5000 for dependent-care expenses. As the employee incurs medical or dependent-care expenses, he or she files a claim with the employer to be reimbursed with his or her own money. Approximately \$1000 in tax savings may be realized for a total set-aside of \$4000. FSAs are widely used in the private sector, and can help to offset rising health insurance costs.

Scientific Integrity, Fluoridation And Fluoride Standards by Bill Hirzy

The union has been engaged since 1985 in the effort to bring integrity to the science behind EPA's drinking water standards for fluoride. During this time we have come to understand the nature of EPA's regulatory work as it involves the tension between two cultures - the science culture and the lawyer culture. And we have come to appreciate that even though these cultures clash from time to time, both are necessary components of EPA's work in administering the Nation's environmental laws^[1].

The science culture values the search for understanding nature. We scientists develop hypotheses about how nature works, conduct experiments to test those hypotheses and, after sufficient experimental work and evaluation, we publish what we think we have found about how nature works. Others may repeat our work, or extend it, or challenge it, and through this repetitive process of hypothesizing, testing and publishing we advance humankind's understanding. At

EPA, this kind of work is used to inform the political leadership as they administer the environmental laws passed by Congress, signed by the President and adjudicated by the courts.

The lawyer culture was explained^[2] by Deputy Administrator A. James Barnes at a meeting that the union arranged with him and employees angry over EPA's backing away from rulemaking on asbestos in 1985. As Mr. Barnes succinctly noted, the lawyer culture values getting the political leadership where it wants to go with policies for administering environmental laws without violating them.

Enter the fluoride drinking water standards controversy.

Legal and political pressure built through the 1970's and 1980's for EPA to take action in regulating fluoride levels in drinking water^[3]. Administrator William Ruckelshaus met with Drinking Water Office Director Victor Kimm and Surgeon General C. Everett Koop on the subject, after which Ruckelshaus asked Kimm for information on three issues: a definition of "adverse health effects," the psychological effects of fluorosis, and a review of data on functional tooth deficits associated with fluorosis. Kimm in turn asked the Office of General Counsel about a definition of "adverse health effect," pursuant to the Safe Drinking Water Act. The political leadership of EPA appeared to be leaning toward setting standards that would control dental fluorosis.

Kenneth Gray of OGC produced an analysis of the case law, which Gray opined gave the Administrator broad discretion in deciding what constitutes an adverse health effect. Gray's concluding sentence is: "On balance, I believe that a Primary regulation to control the dental effects of fluoride^[4] would be upheld because of the substantial deference accorded to the Administrator in defining adverse health effects." Both Gray and Kimm noted the input of Surgeon General Koop, who urged EPA *not* to set a level that would control those dental effects. Koop was head of the U.S. Public Health Service, which has promoted fluoridation and downplayed its adverse effects since the mid 1940's - and continues to this day to do the same.

Kimm reported back to Ruckelshaus on the three issues, summing up with this:

"We have some color photos of fluorotic teeth which shows the kind of chipping, pitting and fracturing individuals exposed to high fluoride^[5] levels must endure. It is difficult to examine such photos and conclude that such effects are not adverse."

After EPA held perfunctory hearings on the matter it finally decided, contrary to its earlier inclination, to bend to the will of the USPHS and others, Victor Kimm's memo notwithstanding.

EPA decided to ignore (or subvert, if you will) provisions of the Safe Drinking Water Act that require EPA to set its health based standards at a level that will prevent any known or anticipated adverse health effect with an adequate margin of safety. It decided to espouse the fiction endorsed by the Surgeon General and the American Dental Association that the kind of dental fluorosis shown below is not an adverse health effect, no matter what common sense dictated or

what the Director of the Office of Drinking Water said in his memo to the Administrator. EPA's health based standard was set putatively to protect against crippling skeletal fluorosis^[6].

When these decisions were to be translated into action by the required proposal in the *Federal Register*, the EPA professional employee who was tasked with writing the notice came to the union to complain about the ethical disaster in which he was being ordered to participate. This was the first we heard about the fluoride issue, and we have been in the fight ever since.

Since that time, evidence of other adverse health effects has been published in the peer-reviewed literature, but EPA ignores it and continues to pretend that it has a sound-science based set of drinking water standards for fluoride.

Meeting With OARM Assistant Administrator Morris Winn

At the meeting the union Executive Board held on September 13 with Assistant Administrator Morris Winn, I left with him the material that appears on the next page. I asked that he arrange a meeting among himself, the Assistant Administrators for Water and Research and Development, the Deputy Administrator and me to discuss this subject. We await a response.

Meanwhile, the union and its individual Executive Board members have signed on to a Statement of Concern about the science of fluoridation. The goal is to stimulate a Congressional hearing on this national policy, which has not been aired before Congress and the public since 1978. Since 1978, a wealth of peer reviewed literature has been published on the carcinogenic, genotoxic and neurotoxic effects of fluoride, as well as on the efficacy of fluoridation^[7]. We believe that a full, open debate on the merits of the science underpinning fluoridation - and EPA's drinking water standards - is long overdue.

The Statement of Concern appears at the union website at www.nteu280.org/fluoride, and we invite EPA employees to look it over, check out the references and recent history^[8] surrounding the issue, both of which are also at the union website URL, and join us in signing on to it. You can do this by downloading the signature page, making the appropriate entries and mailing it to me at Mail Code UN-200T, or by U.S. Mail c/o NTEU Chapter 280, P.O. Box 76082, Washington, D.C. 20013, or by FAX to 202-566-1460.

Or, if you have a contrary view and would like to engage in a debate on this subject, write a critique of the Statement and its references and sent it to the Editor. Proponents of fluoridation have studiously avoided engaging in debates on the issue. When I chaired a symposium for the American College of Toxicology last November titled, "The Great Debate: Fluoridation," I contacted the American Dental Association, the Surgeon General's Office and numerous individual proponents, and all refused to debate benefits and risks of fluoridation. What's to hide?

A reading of the recent history will give you some idea of why fluoridation proponents prefer to stay out of public view.

Conclusion: This is but one case of many in which the science and lawyer cultures have clashed at EPA. Indoor air pollution, malathion risk control, flammable pesticide aerosols, ground water contamination and toxic carpet emissions are a few of the other examples where science has been forced to the back of the bus by political pressures. The union is here to help employees when they are faced with this kind of situation.

The following page is what was given to Assistant Administrator Winn:

SCIENTIFIC INTEGRITY

EPA's drinking water standards for fluoride are a fraud upon the taxpayers.

EPA claims that the dental fluorosis shown here is not an adverse health effect, so it does not have to set its Maximum Contaminant Level Goal (MCLG) to protect against it.

As a result, the MCLG is set at 4 mg/L, a level at which EPA *knows for a fact* that a significant fraction of children will develop the most severe form of the disease shown here.

Not only does EPA need to move on the abstract principle of developing an enforcement process for scientific integrity - which project this union has been pushing for nearly two decades - but it need to move on the concrete case of science fraud that is exemplified by this photograph.

For anyone, especially a scientist, at EPA to hold to the idea that this condition is *not* an adverse health effect is a violation not only of the Principles of Scientific Integrity, but of plain common sense as well. The American people deserve better from this Agency than to have this travesty of science - a fraudulent set of drinking water standards - perpetrated on them.

EPA took this ethically incomprehensible stand in 1985 as its part in defending the national policy to fluoridate every public water supply in the U.S. by not casting any aspersions on fluoride through its drinking water standards program. By rights, the MCLG ought to be well below 1 mg/L, given the language of the Safe Drinking Water Act and the massive amounts of fluoride to which the public is now exposed. - two-thirds of American children residing in fluoridated communities now have this condition on at least one tooth because of over-exposure to fluoride.

In 1983 EPA revealed its own agenda in the fluoridation program. The Deputy AA for Water wrote that EPA thinks it's an ideal solution to a long-standing problem to have air and water pollution minimized by fertilizer manufacturers selling by-product hydrofluosilicic acid to water authorities. In other words, in EPA's view, the solution to air and water pollution by this material is to bleed it directly into our drinking water, because it would pollute the air or surface waters if it were dumped there!

At a minimum, the Agency should get behind the grassroots movement that has been underway for over a year to have a full-fledged Congressional review of the national fluoridation program. The last one was in 1978. Since then research has shown reason for concern over cancer, brain, kidney and bone damage, thyroid effects and the epidemic of fluorosis. The CDC has recently admitted that, as a caries minimizer (not preventative), fluoride doesn't work by ingestion, but mainly by the effect of the high concentrations in tooth pastes. Please take this message to the Administrator, and make EPA the champion Agency on this subject.

X-BYTES

by Dwight Welch

CHICKEN HAWK

[Editor's Note: The author is a Viet Nam veteran who served in the United States Army, Central Highlands of Viet Nam from 1968 to 1969.]

Although it has been used in the past, the current expression "Chicken Hawk" has been renovated, by Viet Nam Veterans to describe the President and those in his administration, who while avoiding going to Viet Nam or other age appropriate wars, have no qualms today about sending this generation off to a war against Iraq. The term is applicable, since most experienced military from Colin Powell to Brent Scowcroft have softly warned against a unilateral military action against Iraq. These generals have seen war, but haven't been listened to, rather the opinions of a bunch of draft dodgers seem to prevail. Those who speak up against this ill advised crusade get criticized as Saddam appeasers. Despite such risks, I feel the moral obligation to speak up against blood for oil.

I'm not going to go through all the arguments, these have been elaborately elucidated by both sides of the debate. What I intend to do here is ask each reader to ask themselves a deeply personal question. If you are young enough, after hearing the Administration's argument for war, would you be willing to put your life in harm's way for it? If you are older, are you willing to risk the life of a child for this proposed war? Have you been given sufficient justification for risking your blood or the blood of your children for this excursion to Hell? I ask this because, for so many, this is not an issue. We have an all volunteer Army now, no draft, so it is safe to advocate war without having any personal risk to you or your family. Leave the job to those forced to do the dirty work of our society due to economic deprivation.

The best argument the President seems to have for war, summarized in his Monday, October 7, 2002 televised speech, is that our intelligence is so crappy, we really don't know what is going on in Iraq. Some of his arguments are down right disingenuous. For instance complaining about Saddam Hussein killing many Iranians and Kurds. The killing of Iranians was funded by the Reagan-Bush Administration to the tune of billions of dollars. Since they were killing our enemies, the Iranians, this was OK. When it came to the genocide of the Kurds, the administration looked the other way, with current Bushites being active in that Administration also. Indeed, Saddam's Ames strain of Anthrax undoubtedly came from Ft. Dietrich, Maryland. Also misleading was his reference to the seized aluminum tubes, which qualified experts declared incapable of sustaining the high RPM for uranium centrifuging. Indeed, in a recently declassified CIA analysis, the threat to the United States from Iraq was termed "low." However, if destined for certain death, the Iraqi leader might use his weapons of mass destruction, significantly increasing the danger to the United States.

No matter who the President or administration, the learning curve seems to be absolutely flat regarding the establishment of tyrants and dictators around the world. During the 40 something

years of the Cold War, the U.S. almost invariably supported dictators and tyrants, leading to Communist governments spreading throughout the Third World. Learning apparently nothing, we continue in this practice of supporting one evil doer in order to take on another. We are now feeling the results of this dunder-headed foreign policy today. Osama bin Laden got his start with U.S. support against the Soviets in Afghanistan, Saddam Hussein, his start, from U.S. support against Iran. (Both from a Reagan-Bush Administration) The bad policy continues as we support the dictator of Pakistan, in order to get bin Laden. Mr. Bush condemns terrorism and those that harbor terrorists, but what about our new found friendship with Pakistan. Wasn't Pakistan where al Qaeda and others got their training? Was it not in Pakistan that bin Laden is hiding? Is it not in Pakistan where fundamentalist schools of "hate-American" training takes place? Mr. Bush says "...Iraq stands alone because it gathers the most serious dangers of our age in one place." Hello? Alone? What about the "Axis of Evil." "...most serious dangers..." hey, Pakistan is nuclear, not just trying to get it, but nuclear. Pakistan has been at war with our ally India and killed a good many Indians. Today, we support a dictator in the quest for revenge against a notable evil. Tomorrow, we will have another Saddam Hussein or Osama bin Laden to deal with.

And what is the positive lesson, we should have learned from the Cold War? It was not war which brought down the "Evil Empire" it was capitalism. The enemy of totalitarian regimes is a large and well informed middle class. For instance now that Russians and Chinese are getting a taste of blue-jeans, color TVs, VCRs, and the like, the Communist Revolution has been indefinitely postponed. "Can't fight the revolution; I'll miss my favorite program."

Sanctions against Iraq have been counter-productive, I'll agree with the President on that. The black market, as black markets are wont to do, circumvented the purpose of the sanctions. But more disastrous, was the reduction of Iraq's middle class. Totalitarian regimes can only thrive in poverty and ignorance. Nikita Krushchev was a far more threatening character than Saddam Hussein. He said, "We will bury you," and he had the nukes to do it. But war didn't bring down the "Evil Empire", capitalistic greed did. Satellite dishes, better than bombs, will free Iraq. With access to the world around them, Iraqis can come to be enlightened. Keeping the people in ignorance serves only the dictators. War, in destroying infrastructure, only reinforces isolation, ignorance and poverty. Even if this dictator is deposed, another will take his place if people are left in ignorance.

While the big shots on Capital Hill and the White House debate the pros and cons of war versus UN inspections, let me point out ways in which your safety as a people and security as a nation is being totally neglected:

Homeland Security The biggest problem standing in the way of this Agency is the issue of Union and Civil Service Protections. But the biggest problem with the government, the reason it works so poorly, is the lack of protection for some of America's bravest heroes, the whistle-blowers. Without Union and Civil Service protections, whistle-blowers would have no standing to end waste, fraud, abuse and mismanagement. As I pointed out in an earlier issue, those FBI managers who quashed intel on terrorists taking flying lessons were not disciplined, they were promoted. We see it here at EPA. Those managers with the worst reputations among

employees, and the least respect, are getting promoted. Evidence of wrong-doing is not even being allowed to be presented.

Vulnerability to Foreign Agents Back during the campaign, the President advocated that the border between the U.S. and Mexico be more open. He argued that a tractor trailer coming from Mexico ought to be able to cross the line as easy as in passing between two states. But what could be on that trailer? Contraband? Weapons? Terrorists? Sixty Minutes has documented that many terrorists are following the same routes as illegal immigrants. For years the government has been looking the other way on illegal immigrants. Cheap labor is needed to do the dirty jobs spoiled Americans are no longer willing to do. But what does this do for our security, when an illegal immigrant doesn't want to work, but wants to kill instead? What actions were taken regarding those who let the hijackers in? A backlog in immigration, but certainly no management accountability that I've heard of. Our borders must be strengthened and visitors as well as immigrants need to be more carefully looked at.

The International Inventory of Nuclear Materials I've seen nothing about this. Again Sixty Minutes got a radioactive phoney bomb from Istanbul, a known black market of nuclear materials, to Brooklyn New York without ever having the container searched. The nuclear powers need to reach agreements on ultra strict control of these materials. We need to be supporting test ban treaties not getting out of them.

Petrol Dollars Support Terrorism It has been calculated that if Americans traded in their SUVs for fuel efficient cars such as Toyota Prius, we could end our dependence on foreign oil. Want to defeat terrorism? Stop giving them your money. Take the train, car pool, and trade in that gas guzzler. Not only will you starve the middle eastern tyrants, but you might help on global warming to boot. Does the President set an example being driven in an SUV? The EPA Administrator is also driven around in a Chevy Tahoe SUV, although it is equipped to run on alcohol, at about 14 mpg, this still doesn't set a good example. And why should the most efficient cars be coming from Japan? They aren't. I read in an automotive magazine that General Motors is introducing a hydrogen fuel-cell car. But it is going to be marketed in Europe where they have a goal of converting to non-hydrocarbon vehicles. Energy conservation would inhibit terrorist dollars, but this doesn't seem to be a big Administration priority. The same people that scoffed at DDT and the Bald Eagle, at CFCs and the Ozone hole, are mocking global warming. But after DDT was banned, Bald Eagle was removed from the endangered species list and is thriving. After CFCs were banned, the Ozone Hole is now finally closing.

Where on Earth is Osama bin Laden? The name, once heard dozens of times a day, has all but dropped out of the news. I thought, Mr. President, that you were going to smoke him out of his hole and hunt him down. If you are prepared to have the military commitment to overrun Iraq, why hasn't this same sized force been used to get bin Laden? Which brings me to my final point.

While Democrats accuse the President of politicking with this war, in looking for short term results, a GOP Congress, the long term effects may backfire. We can fight this war as a typical late 20th century war, go in and get out. The backfire might then be that Saddam Hussein, like bin Laden, may again get away and cause us to not only look foolish, but fail to achieve the goal

sought. With a more thorough strategy, the only way to surely get Saddam, we will have to put a lot of American troops on the ground, and the casualties from urban warfare could become quite large. While a dwindling majority of Americans support a war, a 60% majority is against it if 5,000 or more U.S. lives are lost, which may be the case if the job is to be done thoroughly.

As American citizens, we all have not only the right, but the responsibility to question our support or non-support for this war. As stated above, after considering the evidence for a war, we must each ask ourselves, "Would I risk my life or the life of my child for this war?" The answer is an easy one, we haven't been given sufficient justification.

IN THE OCTOBER ISSUE

The October issue of INSIDE THE FISHBOWL will be coming out in a week or two. Highlighted is extensive coverage of the NO FEAR law celebration on Capitol Hill, complete with photo coverage. We may also have a few other surprises so watch your e-mail box in the next week or to.

^[1] Nevertheless, when the two clash and the lawyer culture intrudes on that of science through attempts to force use of bogus science to subvert environmental law, scientists have no choice but to resist. Defending those who choose to resist is the prime reason this union exists.

^[2] See History section of our website at www.nteu280.org

^[3] At the same time, the push by the U.S. Public Health Service to fluoridate all U.S. public water supplies proceeded apace.

^[4] That is, set at a level to prevent dental fluorosis. This explanatory footnote is mine - not Gray's.

^[5] At 4 mg/L, the EPA health-based standard, about half the population develops moderate to severe dental fluorosis.

^[6] All this appears to have occurred so that EPA would not throw sand in the gears of the USPHS program to fluoridate all public water supplies in the U.S. by alerting the public to dental fluorosis and other adverse health effects associated with fluoride.

^[7] USPHS now admits that its previous theory of action - tooth hardening by fluoride - is wrong, and that fluoride reduces (not prevent) caries incidence through a topical effect, not through systemic exposure.

^[8] Recent history of hearings, statements, referenda, lawsuits on fluoridation around the world.