

To Clallam County Board of Health, and Mary Selecky,
State Secretary of Health, and Member of State Board of Health

Last January Protect the Peninsula's Future presented you, Clallam PUD, and the City of Port Angeles with a Constructive Notice along with evidence for our belief that fluoridation chemicals presently being added to drinking water in Port Angeles fail to meet a state-required standard known as ANSI/NSF Standard 60. We asked that you investigate promptly and suspend use of the product until compliance is documented. The major issue is absence of toxicology information as required by Standard-60. (WAC 246-290-220(3)).

We have addressed Clallam County Board of Health at almost every meeting since January. Your only responses have been that this matter is outside your jurisdiction and that the State Office of Drinking water's engineer, Denise Clifford assures Dr. Locke she is satisfied that fluorosilicic acid additives used by the City of Port Angeles are fully in compliance with federal and Washington State Law. (Ref. Board Minutes March 18, 2008 page 2)

But the cat got out of the bag when WDOH Information officer Leslie Gates forwarded our submitted letter, written by Gary Pittman, to the Office of Environmental Health Assessments. Her explanation to us was: "we at the Office of Drinking Water have neither a role nor expertise in toxicological assessment". That Pittman letter apparently then dropped into a black hole.

What could be the basis for the Clifford assurances to Dr. Locke?

Ms. Gates then told us that Seattle had tested the fluoridation chemical. Water Quality Engineer for Seattle Public Utilities Lynn Kirby responded to our request for the report. She was able to locate testing done for fluorosilicic acid used at the Tolt Treatment Facility. I append the report. It includes only 22 inorganic elements. There is not even a mention of organic constituents frequently added or formed in the fluoride extraction process, such as Synspar, oil-based defoamers, dioxins, polymers, and naphthalene. This is a far cry from the ANSI/NSF protocol requirements.

The NSF Fact Sheet from the NSF web site (February 2008) says, "The standard requires full disclosure of each chemical ingredient in a product. It also requires a toxicology review: A toxicology evaluation of test results is required to determine if any contaminant concentrations have the potential to cause adverse human health effects."

Regard for public health and welfare surely requires familiarity with the major review written for EPA, released in March, 2006 on [the National Academies Press web site](#). This is titled: "Fluoride in Drinking Water: A Scientific Review of EPA's Standards". Staff of the State Board of Health tells me they do not have a copy. My public disclosure requests failed to turn up any evaluation of this basic work by staff of WDOH.

This report calls for numerous safety studies and presents evidence that municipal water at recommended fluoride concentrations provides overdoses to infants when it is used to dilute formula. It states that over doses also occur when kidney function is poor and when water intake is high for any reason. It states that fluoride is known to depress brain, thyroid, and immune functions and increases blood sugar in diabetics. Levels presently approved by EPA and the State for fluoride are too high. The State and this local Board are not warning the vulnerable members of the population, not meeting their duty to protect public health.

We would like to believe that WDOH and the County Board of Health are committed to protect the health of infants and other vulnerable members of the public entrusted to their oversight. WDOH claims it is dedicated to provide accurate evidence-based information to the public. When can we expect your response to the questions we have raised and action to disallow use of improperly certified fluorosilicic acid?

Eloise Kailin, M.D. Corresponding Secretary, PPF

Encl: Letter to Mary Selecky 5/7/08

Letter Gary Pittman

E-mail and Tabular Report, Lynn Kirby 8/13/08

June 17/2008 Presentation of PPF to Clallam County and State Boards of Health (Dr. Yu attending)

Page from NSF website February, 2008 "NSF Standard 60"